

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM

**NPDES Permit No. MD0068322
State Discharge Permit No. 11-DP-3318**

**ANNUAL UPDATE NUMBER 25
FISCAL YEAR 2020**

Submitted to:

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Submitted by:

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Section I. Introduction

A. Background

Since passage of the Federal Water Pollution Control Act Amendments of 1972, subsequent amendments have increasingly emphasized the quality control of stormwater runoff. The most recent revision, the Water Quality Act of 1987, establishes permit requirements for both Municipal Separate Storm Sewer Systems (MS4s) and stormwater discharges associated with industrial discharges. Section 402(p) of the Act requires phased permit applications, compliance requirements, and deadlines for application submission and approval.

On November 16, 1990, the final National Pollutant Discharge Elimination System (NPDES) Permit Application Regulations for Storm Water Discharges were published in the *Federal Register*. The Regulations establish Phase I permit conditions for large (serving populations greater than 250,000) and medium (serving populations greater than 100,000 but less than 250,000) MS4s. Included are requirements to effectively prohibit non-stormwater discharges into storm sewers and controls to reduce the discharge of pollutants to the maximum extent practicable. The Regulations also require NPDES permits for stormwater discharges associated with certain industrial activities.

The U.S. Environmental Protection Agency (USEPA) has delegated review and permitting authority for Maryland's large and medium municipalities to the Maryland Department of the Environment (MDE). Within the MDE, the Water and Science Administration is responsible for issuing permits to designated municipalities.

B. Howard County, Maryland

Howard County, hereafter referred to as "the County", with an estimated population of 326,000 according to the Howard County Department of Planning and Zoning (DPZ) 2020 population data, is one of five medium and five large jurisdictions in Maryland that is regulated by a Phase I MS4 Permit. Additionally, the Maryland State Highway Administration is regulated by a Phase I MS4 Permit. Howard County's first permit, (MS-HO-95-008, which was subsequently renumbered to MD0068322, 99-DP-3318), went into effect on April 17, 1995 and expired on April 17, 2000. During this period, Howard County undertook an extensive effort to improve Maryland's water quality and became a state and national leader in the control of stormwater. Howard County's second permit, (Number MD0068322, 00-DP-3318), went into effect on June 15, 2000 and expired on June 15, 2005. This permit included conditions that reflected Howard County's progress toward stormwater management (SWM) program implementation under its NPDES MS4 permit. The County's third permit (Number MD0068322, 00DP-3318) went into effect on June 20, 2005 and was to expire on June 20, 2010, but due to a delay in the issuance of the County's fourth permit, the County continued to operate under its third permit per MDE until December 18, 2014 when the fourth permit was issued. The conditions of the fourth permit (Number MD0068322, 11-DP-3318), are similar to previous permits. As required by the conditions of the permit, the County must prepare Annual Updates to report on the progress made during the preceding permit year.

C. Annual Update Number 25

For Annual Update Number 20 (AR20), MDE required breaking out two six-month permit periods to report on permit compliance under the County's third and fourth permits. Therefore, Annual Update Number 21 (AR21) was the first to report on a full year under the County's fourth NPDES MS4 Permit. The fourth permit expired on December 17, 2019 but has been administratively continued. Therefore, Annual Update or Annual Report Number 25 (AR25) is the fifth full-year report but is considered the report for the sixth year under the County's current NPDES MS4 Permit. Information is presented in the following parts and sections:

- Section I. Introduction
- Section II. Standard Permit Conditions
- Section III. Program Review and Annual Progress Reporting
- Section IV. Special Programmatic Conditions

Each section generally begins with the permit conditions, which are denoted in bold italics. Following each permit condition, as applicable, is a description of the progress made towards meeting the permit conditions within the annual update reporting year. Annual data are compiled and reported on a fiscal year basis.

Section II. Standard Permit Conditions

A. Permit Administration

Howard County shall designate an individual to act as a liaison with the Maryland Department of the Environment (MDE) for the implementation of this permit. The County shall provide the coordinator's name, title, address, phone number, and email address. Additionally, the County shall, in its annual reports, submit to MDE an organizational chart detailing personnel and groups responsible for major NPDES program tasks in this permit. MDE shall be notified of any changes in personnel or organization relative to NPDES program tasks.

Annual Update Number 25 Status

The County has included the current organizational information as a narrative file listed in the geodatabase. Mr. Mark S. Richmond, Chief of the Stormwater Management Division (SWMD), is the liaison with MDE and can be reached at (410) 313-6413 or msrichmond@howardcountymd.gov.

B. Legal Authority

Howard County shall maintain adequate legal authority in accordance with NPDES regulations 40 CFR Part 122.26 throughout the term of this permit. In the event that any provision of its legal authority is found to be invalid, the County shall notify MDE within 30 days and make the necessary changes to maintain adequate legal authority. All changes shall be included in the County's annual report.

Annual Update Number 25 Status

The County previously submitted a certification from the County Attorney to MDE, which stated that the County possesses the authority to directly perform the activities described in 40 CFR 122.26(d)(2)(i) and the NPDES permit. Specifically, the County Office of Law has certified that the laws of Howard County, Maryland provide adequate legal authority to carry out Howard County's NPDES Permit for Operators of MS4 programs. The legal authority is adequate to implement programs that control the quality as well as the quantity of water that is discharged through its storm sewer system.

C. Source Identification

Sources of pollutants in stormwater runoff countywide shall be identified and linked to specific water quality impacts on a watershed basis. The source identification process shall be used to develop watershed restoration plans. The following information shall be submitted annually for all County watersheds within the permit area in geographic information system (GIS) format with associated tables as required in PART V of this permit:

1. ***Storm drain system: all infrastructure, major outfalls, inlets, and associated drainage areas delineated;***

2. ***Industrial and commercial sources: industrial and commercial land uses and sites that the County has determined have the potential to contribute significant pollutants;***
3. ***Urban best management practices (BMPs): stormwater management facility data including outfall locations and delineated drainage areas;***
4. ***Impervious surfaces: public and private land use delineated, controlled and uncontrolled impervious areas based on, at a minimum, Maryland's hierarchical eight-digit sub-basins;***
5. ***Monitoring locations: locations established for chemical, biological, and physical monitoring of watershed restoration efforts and the 2000 Maryland Stormwater Design Manual; and***
6. ***Water quality improvement projects: projects proposed, under construction, and completed with associated drainage areas delineated.***

Annual Update Number 25 Status

Updated versions of the County's Source Identification GIS data (items 1. – 6. above) are provided with the digital download of this Annual Update. Several items related to Source Identification are noted below.

Storm Drain System

Outfall records are included in the Outfall and OutfallDrainageArea feature classes of the MDE NPDES Geodatabase. Non-major outfalls are added to the Outfall feature class as a result of the IDDE inspections. In order to fully document the inspections in the database, the outfall where an inspection occurred is included in the database regardless of its major/non-major NPDES outfall status. Other County GIS storm drain system layers are also included with the data submittal including outlets, inlets, stormdrains and manholes. This is a separate file listed as a narrative file in the MDE NPDES Geodatabase.

The permit requires that drainage areas be delineated to all BMPs in the County. BMP drainage areas are submitted as the BMPDrainageAreas feature class in MDE's NPDES Geodatabase. The difference between the total number of BMPs and the number of BMP drainage areas is attributable to BMPs such as dry wells, and other small single lot LID practices, where it is impractical to delineate a drainage area to such a localized BMP. At present the County has no plans for delineating drainage areas to each of these individual lot BMPs, but these BMPs are factored into the pollutant removal computations discussed later in this Annual Update. Per MDE's database requirements, records stored in the AltBMPLine, AltBMPPoint, and AltBMPPolygon feature classes do not have a corresponding drainage area.

Industrial and Commercial Sources

Howard County obtained State Department of Assessments and Taxation (SDAT) data, which identified 2,662 commercial and industrial parcels in the county for the 2020-2025 permit cycle. All commercial and industrial parcels were then entered into a Commercial/Industrial CRM database. The County set a goal of conducting a visual survey of over 530 sites each year in order to perform a visual survey on each site within the anticipated five-year permit term. The surveys for the five-year permit term of 2014-2019 were completed in FY19. In FY20, 620 sites were surveyed. The surveys are conducted by the four inspectors in the SWMD who also inspect stormwater management facilities and perform illicit discharge field investigations. During the survey, the inspectors photograph each site, and if they find a suspected discharge, they try to determine the source. Back in the office, they complete a Field Data Sheet and enter the site information, photos, and scanned Field Data Sheet into the Commercial/Industrial CRM database. Any suspected discharges are referred to the County's IDDE Team

Leader and the corresponding Field Data Sheet and photos are saved into the SWMD's shared drive. The IDDE Team Leader then follows up on and resolves the suspected discharge. GIS data representing the potential industrial and commercial sources and the FY20 assessed sites are included as a separate GIS database listed in the narrative files.

Urban Best Management Practices (BMPs)

Urban BMP data are included in multiple feature classes and tables in the geodatabase including BMPPOI, BMP, BMPInspections, AltBMPLine, AltBMPLineInspections, AltBMPPoly, AltBMPPolyInspections, RestBMP, and RestBMPInspections. These feature classes and tables encompass development BMPs, restoration projects, and alternative BMPs.

Howard County currently provides BMP data in the database in the point of investigation or POI format. The method accounts for smaller dispersed BMPs built under MDE's Environmental Site Design (ESD) guidance as required by the Stormwater Management Act of 2007. The POI method accounts for nested BMPs and provides an accounting framework for impervious area treatment that avoids double counting but accounts for volumes treated by upstream BMPs. BMPs within a POI system are linked by their drainage patterns and volumes and impervious surfaces are computed as a system. Portions of the County's stormwater BMP dataset have undergone extensive analysis to combine BMPs into POI groups, identify downstream POI relationships, flow-to relationships, and recompute treated volumes and Pe treated values based on the POI network. Other BMPs in the dataset, while still adhering to the POI database framework are set to a one to one relationship between the BMP and POI.

Impervious Surfaces

As a requirement of section PART IV.E.2.a of the NPDES MS4, the County must conduct an impervious area assessment. The assessment defines the County's impervious area baseline and sets the 20% impervious area restoration goal for pre-2002 impervious acres not already restored to the maximum extent practicable (MEP). The restoration was required to be complete by December 2019, the end of the current permit term. As part of the impervious area accounting and restoration process, the MS4 Permit provides for each Phase I MS4 municipality to submit an updated and revised impervious baseline in year 4 of the current permit, which for Howard County was 2018. The revised baseline can include changes related to newly documented BMPs, updates to restoration BMP crediting, and improvements in the supporting GIS data and databases.

Per the 2014 MDE guidance, the County completed a thorough analysis and delineated the stormwater conveyance or system of conveyances owned and operated by Howard County in its *Impervious Area Classification and Baseline Accounting* report. To define the delineated MS4, Howard County included the Census Urbanized Area, County-owned property and roadway right of way, and those areas that drain to and through the County's currently mapped stormwater infrastructure including outfalls, stormdrains, and stormwater BMPs. Howard County submitted the revised impervious baseline in December of 2018 with the NPDES annual report. Per comments from MDE dated August 2, 2019, MDE generally accepted Howard County's methodology but asked for clarification of the classification of impervious acres deducted from Howard County's baseline.

The *Impervious Area Classification and Baseline Accounting* report was revised and included as a Narrative File with AR24 in November of 2019. This version attempted to address MDE's comments, clarify the impervious area assessment, and finalize the County's baseline. The impervious surfaces used in the analysis were included as a GIS database included with the AR24 FY19 narrative files. A draft of MDE's comments on the November 2019 version were received by the County in April of 2020. A major comment addressed the County's use of a delineated MS4 area to define the impervious areas that the County is responsible for in terms of the 20% restoration goal. Following receipt of the comments and additional discussions between Howard County and MDE, Howard County

chose to forgo the use of a delineated MS4 boundary and is using the jurisdiction-wide MS4, per MDE direction, for the purposes of setting the baseline, 20% impervious area restoration target, and performing the final impervious area restoration accounting for the permit term ending in 2019. However, the County reserves the right to revisit the issue in the future should it become necessary.

The County submitted a FINAL baseline accounting methodology and results report to MDE in June of 2020. The County also submitted a final version of the *Howard County Impervious Restoration Accounting: Methodology and Results* report, which addresses MDE comments on previous versions of the report, and documents the County's impervious restoration through the end of the permit term.

Both reports are included as narrative files included with the AR25 submittal. Additional details are provided in this annual report under the Restoration Plan section.

Monitoring Locations

The County's NPDES monitoring locations and associated drainage areas are included in the database in the MonitoringSite feature class. Monitoring locations include both the biological and chemical monitoring sites for the Wilde Lake subwatershed monitoring and the Red Hill Branch subwatershed monitoring conducted in fulfillment of Part IV.F.1 Watershed Restoration Assessment.

Part IV.F.2 Stormwater Management Assessment is being conducted at the Rumsey Run project site. Locations of the geomorphic monitoring locations are included with the data submittal as a separate GIS layer.

Howard County conducts monitoring at several other sites beyond what the NPDES permit requires. These sites include the Turf Valley and Dorsey Hall monitoring studies which are further described under permit condition IV.F.1 of the annual report. Monitoring site locations for these sites are included in the MonitoringSite feature class of the geodatabase.

Water Quality Improvement Projects

Water quality improvement projects are stored in several features and tables including RestBMP, AltBMPLine, AltBMPPoly, AltBMPPoint and their associated Inspection tables of the MDE NPDES Geodatabase. For this database, the County is using the expiration of its 3rd generation permit date of June 20, 2010 as the cutoff between projects associated with the old, versus the current permit; however all improvement projects are included in the dataset.

D. Management Programs

The following management programs shall be implemented in areas served by Howard County's MS4. These management programs are designed to control stormwater discharges to the maximum extent practicable (MEP) and shall be maintained for the term of this permit. Additionally, these programs shall be integrated with other permit requirements to promote a comprehensive adaptive approach toward solving water quality problems. The County shall modify these programs according to needed program improvements identified as a result of periodic evaluations by MDE.

1. Stormwater Management

An acceptable stormwater management program shall continue to be maintained in accordance with the Environment Article, Title 4, Subtitle 2, Annotated Code of Maryland. Activities to be undertaken by the County shall include, but not be limited to:

- a. Implementing the stormwater management design policies, principles, methods, and practices found in the latest version of the 2000 Maryland Stormwater Design Manual. This includes:*
 - i. Complying with the Stormwater Management Act of 2007 (Act) by implementing environmental site design (ESD) to the MEP for new and redevelopment projects;*
 - ii. Tracking the progress toward satisfying the requirements of the Act and identifying and reporting annually the problems and modifications necessary to implement ESD to the MEP; and*
 - iii. Reporting annually the modifications that have been made or need to be made to all ordinances, regulations, and new development plan review and approval processes to comply with the requirements of the Act.*
- b. Maintaining programmatic and implementation information including, but not limited to:*
 - i. Number of Concept, Site Development, and Final plans received. Plans that are re-submitted as a result of a revision or in response to comments should not be considered as a separate project;*
 - ii. Number of redevelopment projects received;*
 - iii. Number of stormwater exemptions issued; and*
 - iv. Number and type of waivers received and issued, including those for quantity control, quality control, or both. Multiple requests for waivers may be received for a single project and each should be counted separately, whether part of the same project or plan. The total number of waivers requested and granted for qualitative and quantitative control shall be documented.*

Stormwater program data shall be recorded on MDE's annual report database and submitted as required in PART V of this permit.
- c. Maintaining construction inspection information according to COMAR 26.17.02 for all ESD treatment practices and structural stormwater management facilities including the number of inspections conducted and violation notices issued by Howard County.*
- d. Conducting preventative maintenance inspections, according to COMAR 26.17.02, of all ESD treatment systems and structural stormwater management facilities at least on a triennial basis. Documentation identifying the ESD systems and structural stormwater management facilities inspected, the number of maintenance inspections, follow-up inspections, the enforcement actions used to ensure compliance, the maintenance inspection schedules, and any other relevant information shall be submitted in the County's annual reports.*

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Stormwater Management Act Compliance

The County continues to comply with the Act and implement ESD to the MEP for new and redevelopment projects under the current version of the Design Manual, including the 2009 revision for ESD, as well as provide feedback on that version, as necessary. The County has had no modifications to the design manual requirements regarding ESD to the MEP, and there are no programmatic problems to address at this time.

In 2017, Council Resolution CR94-2017 revised Volume I (Storm Drainage) of the Design Manual to mandate a specified amount of rainfall for 100-year storms; to clarify provisions related to open channels; to amend provisions related to stormwater management facilities in Howard County; and to make technical changes related

to Volume I, Storm Drainage, of the Design Manual. This resolution has not changed MDE requirements for ESD to the MEP.

In 2018, Council Bill CB56-2018 was approved to provide peak stormwater management within the Tiber and Plumtree Branch watersheds. This bill was in response to the historic flooding within historic Ellicott City. This bill requires additional stormwater management beyond the 100-year storm event. There have been no changes to the Howard County requirements to provide ESD to the MEP.

Stormwater Management Programmatic and Implementation Information

Stormwater management is reviewed for compliance with the Howard County Design Manual, Volume I – Storm Drainage, throughout the development process by Planning and Zoning – Development Engineering Division. The programmatic and implementation information identified as i. – iv. above has been included in this Annual Update in the database under Stormwater Management as required by Part V of the County’s MS4 Permit.

Construction Inspection

Stormwater construction inspections are the responsibility of Public Works – Construction Inspection Division. A summary of the stormwater construction inspections and violation notices issued is listed in Table 1 and is listed in the SWM Associated Table in the geodatabase.

Table 1: Construction Inspections

Summary of Inspections and Violations	Total July 1, 2019 – June 30, 2020
Number of Construction Inspections	8,956
Number of Construction Violations	78

Preventative Maintenance Inspections

The SWMD is responsible for SWM BMP inspections, which continue to be performed for County, Board of Education, and private SWM facilities on a triennial basis. A summary of the inspections from July 1, 2019 through June 30, 2020 is listed in Table 2. There are currently 1,428 County-maintained BMPs, 163 Board of Education BMPs, 3,089 privately owned and maintained BMPs, and 5,268 privately owned and maintained residential ESD BMPs for a total of 9,948 BMPs, which are inspected on a three-year cycle.

Table 2: Preventative Maintenance Inspections

Inspection Detail	Inspections July 1, 2019 - June 30, 2020
Maintenance Inspections	3,048
County Maintained BMPs	424
Board of Education Maintained BMPs	84
Privately Maintained BMPs	1,001
Residential ESD BMPs	1,539
Follow-up Inspections	447
Enforcement Actions (Extra Follow Up)	3 Citations / 9 NOVs
Total	3,507

** The inspection cycle for Board of Education Maintained BMPs begins once the students are released for the summer of each year.*

The County sends a letter to the owner of any BMP needing corrective action (structural or non-structural) giving them a deadline for addressing the items. The County performs follow up inspections to verify that compliance is achieved. If the owner does not comply, a citation or Notice of Violation (NOV) is issued. A NOV is a warning letter providing the owner 14 days from the date of the letter to either correct the deficiencies or request an extension in writing. A citation is the legal action taken to initiate an actual fine or civil penalty against the owner. This action takes place if after 14 days, there has been no contact from the owner.

Inspections for tree planting sites are performed by the Department of Recreation and Parks. Inspections are performed according to the *Policies and Procedures: Reforestation Tree Planting on Public and Private Lands, Inspecting Forest Conservation Easements, and Inspecting Forest Conservation Easements with GIS Tools*. Inspections for voluntary BMPs on private property and those installed by Howard EcoWorks, formerly READY, are performed by the Office of Community Sustainability. Long-term verification inspections for stream restoration projects are performed by the SWMD.

2. Erosion and Sediment Control

An acceptable erosion and sediment control program shall continue to be maintained and implemented in accordance with the Environment Article, Title 4, Subtitle 1, Annotated Code of Maryland. Activities to be undertaken by the County shall include, but not be limited to:

- a. Implementing program improvements identified in any MDE evaluation of the County's erosion and sediment control enforcement authority;***
- b. Ensure that construction site operators have received training regarding erosion and sediment control compliance and hold a valid Responsible Personnel Certification as required by MDE;***
- c. Program activity shall be recorded on MDE's annual report database and submitted as required in PART V of this permit; and***
- d. Reporting quarterly, information regarding earth disturbances exceeding one acre or more. Quarters shall be based on calendar year and submittals shall be made within 30 days following each quarter. The information submitted shall cover permitting activity for the preceding three months.***

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Howard County submitted its renewal application for delegation of erosion and sediment control enforcement authority on September 28, 2018. MDE conducted a field review on November 1, 2018 inspecting 15 active sites. Follow-up site inspection documentation was immediately provided as needed. MDE's written review and re-authorization letter was received on March 19, 2019 granting Howard County delegation authority effective through June 30, 2021.

Program Improvements

To maintain and improve inspection skills and current knowledge of laws and specifications the Construction Inspection Division (CID) requires all inspection staff to participate in self-paced training. Topics include E&S Law,

Proper Documentation and Lessons Learned (a historical look at common problems and solutions). Site inspections are conducted of each inspector's sites to evaluate application of skills, knowledge, and overall performance.

The Erosion and Sediment Inspection Manual is regularly updated to reflect changes in laws, specifications, and division policy regarding Erosion and Sediment Control.

Responsible Personnel Certification

In accordance with the re-authorization letter issued by MDE on May 1, 2015 the following process is in place relative to the Responsible Personnel Certification:

"This training may now be taken on MDE's website and all inquiries should be referred to this on-line application that will now satisfy the County's MS4 permit obligations."

MDE issues the certification online. All of the CID staff and consultants have taken the online class, registered in MDE website, and acquired their Responsible Personnel Certifications.

Program Activity

The electronic program activity information has been included in this Annual Update, in the database under the Erosion Sediment Control Associated Table as required by Part V of the County's MS4 Permit.

Earth Disturbances > 1 acre

Construction Inspection Division submits quarterly reports for earth disturbances greater than one acre directly to MDE. This information is also included in the Annual Report database under Quarterly Grading Permit Feature Class and Quarterly Grading Permit Information Associated Table as required by Part V of the County's MS4 Permit.

3. Illicit Discharge Detection and Elimination

Howard County shall continue to implement an inspection and enforcement program to ensure that all discharges to and from the MS4 that are not composed entirely of stormwater are either permitted by MDE or eliminated. Activities shall include, but not be limited to:

- a. ***Field screening at least 100 outfalls annually. Each outfall having a discharge shall be sampled using a chemical test kit. Within one year of permit issuance, an alternative program may be submitted for MDE approval that methodically identifies, investigates, and eliminates illegal connections to the County's storm drain system;***
- b. ***Conducting annual visual surveys of commercial and industrial areas as identified in PART IV.C.2 above for discovering, documenting, and eliminating pollutant sources. Areas surveyed shall be reported annually;***
- c. ***Maintaining a program to address and, if necessary, respond to illegal discharges, dumping, and spills;***

- d. *Using appropriate enforcement procedures for investigating and eliminating illicit discharges, illegal dumping, and spills. Significant discharges shall be reported to MDE for enforcement and/or permitting; and*
- e. *Reporting illicit discharge detection and elimination activities as specified in PART V of this permit.*

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Howard County's Illicit Discharge Detection and Elimination (IDDE) program incorporates four components to meet the permit requirements:

- Prevention Program
- Detection Program
- Removal and Compliance Program
- Program Management and Reporting

Prevention Program

The County's IDDE Program uses public outreach and in-house employee training to prevent illicit discharges. Outreach is also done at community events such as the annual "GreenFest" event. Unfortunately, GreenFest was canceled this year just weeks beforehand due to COVID-19. In lieu, the County reached the public through online resources. This included several updates to the County's website, some that pertain particularly to the COVID-19 pandemic. In-house training is performed for County departments involved in the handling of chemicals and in the maintenance of facilities. Howard County was not able to complete all the annual in-person environmental compliance training sessions due to the pandemic. The staff who were not able to attend in-person sessions will take online courses as their workload allows.

In order to prevent deliberate discharge of leaves to the storm drain inlets, leaf flyers were emailed to all HOAs in the County in fall 2019 so that the HOAs could educate their residents on proper handling of leaves. We began research for a targeted outreach program to automotive repair and washing businesses, which will be implemented during the next annual permit cycle. The County also utilizes an illicit discharge reporting form on its SWMD website with a hotline number for public reporting of an illicit discharge. The web address is:

<https://www.howardcountymd.gov/Departments/Public-Works/Bureau-Of-Environmental-Services/Stormwater-Management/Illicit-Discharges>

Illicit discharge complaints can also be reported through the TellHoCo smartphone app. Info entered in the app includes a map, photos, and a description of the possible issue and directly notifies the IDDE manager. In addition, the County is proactively surveying all commercial and industrial properties in the County to identify potential illicit discharges.

Detection Program

Howard County investigated 96 possible cases in FY20. A summary of these cases is included as a narrative file listed in the geodatabase. These cases were identified through the three programs in place to detect illicit discharges.

1. The first program is the inspection of 100 outfalls per year. The inspections this year were focused on the Route 40 and Route 1 corridors and the more dense commercial areas in Columbia, and 101 outfall inspections were completed in FY20. The County provides maps to the contractor showing the areas where the inspections must be conducted. The contractor then identifies the outfalls to inspect. They visit the outfalls at least 72 hours after a precipitation event and look for flow. If they see any flow, they collect a sample and analyze it for the required analytics. They then trace the discharge up the storm drain system to identify the source. The contractor then calls the County IDDE Team Leader to report the discharge, so the County can follow up with the property owner to stop the discharge. Of the 101 outfalls inspected in this reporting period, one suspected discharge was identified.
 - a. Howard County's consultant identified a large flow of clear water from Outfall 220860 during the annual outfall sampling. The case was initially referred to the Bureau of Utilities as a potential water line break, and Utilities discovered fluoride in the water. However, the fluoride level was lower than expected for a drinking water supply, and it was determined that the likely source was a sump pump for an apartment parking garage.
2. The second program is a visual survey of commercial/industrial parcels, conducted by County inspectors. If the inspectors see any suspected discharges, they try to identify the source and notify the IDDE Team Leader. In this reporting period the County conducted 620 visual surveys and identified two potential discharges that required further action.
 - a. The County issued an NOV for the first case for oil leaking from a vehicle, many oil stains, and drums stored outdoors.
 - b. The County issued a verbal warning for the second case for rinsing floor mats outdoors.
3. The third program is a response to reports of illicit discharge received from the public, other Howard County departments, MDE, or EPA. This category also includes happenstance discoveries made by SWMD inspectors in the course of their duties. Howard County responded to the following complaints/reports in FY20:
 - 64 reports were received directly from the public via phone, email, postal mail, County website submission, "TellHoCo" web app, or walk-in.
 - 16 reports were referred by other Howard County agencies.
 - 11 reports were made internally, such as issues discovered by SWMD Inspectors other than the commercial industrial and outfall inspections.
 - 2 reports were referred by MDE.

Howard County noticed an uptick in submissions through the TellHoCo app. We received 27 complaints that led to investigation. This shows that public outreach and education have made an impact and our residents are increasingly aware of our Illicit discharge program.

Removal and Compliance Program

The County uses the procedure described below to address illicit discharges.

Initial Response: Phone call, email, or inspection. The inspector will complete a Field Inspection Report and leave one copy with the owner. The report will identify any problems identified and actions required, including possible notification, referral, and/or collaboration with other government agencies. This method is used with both industrial/commercial discharges and residential (individual or Homeowners Association) discharges.

Notice of Violation: The County issues a Notice of Violation (NOV) for more serious or repeat discharges. The NOV will require the owner to respond within two weeks with a plan of action, and to perform corrective action within a specified time frame (typically 60 days).

Citation: In the case of very serious or repeat (unabated) discharges, the County will issue a civil citation. Under Howard County Code, prohibited discharges and illicit connections are a criminal misdemeanor subject to a fine not exceeding \$900.00, or imprisonment not exceeding five months or both. Alternatively, or in addition to and concurrent with criminal penalties, the County may enforce prohibited discharges and illicit connections as a Class A civil offense, subject to a minimum fine of \$500 and a maximum fine of \$1000 per day.

Abatement/Compliance Verification: The County will request that all illicit discharge violators submit proof (photos, contractor's inspection notes, email or letter) that compliance was completed within the specified time frame. If necessary, the County will follow up at violation sites to ensure that compliance occurs in a timely and effective manner. Visual observation and, if necessary, monitoring will be performed to verify that the illicit discharge was stopped and/or necessary permit obtained.

Howard County found 64 cases that required abatement. We sent out 20 NOVs and three citations. Two of the citations cases required more than one round of citations. We referred 31 cases to either the Construction Inspection Division, the Bureau of Highways, or the Department of Recreation and Parks for further action. We resolved ten cases with either verbal onsite contact or an educational letter sent in the mail.

Five types of cases were referred to other Howard County departments:

1. Water/sewer leaks (to Bureau of Utilities)
2. Construction site erosion & sediment control complaints (to Construction Inspection Division)
3. Trash nuisances & dumping, not affecting storm drains or waterways (to Health Department)
4. Prohibited vehicle storage not affecting storm drains or waterways (to Department of Planning & Zoning)
5. Debris along roadways or other County property (to the Bureau of Highways or the Department of Recreation and Parks).

Thirty-two cases were investigated but found not to be illicit discharges, generally including:

1. Iron floc
2. Sump pump discharge
3. Groundwater flows
4. Spills/leaks cleaned up before reaching a storm drain or waterway
5. Allowable pool discharges

Program Management and Reporting

Howard County's IDDE Program has a staff of seven, including one engineer, one planner, four inspectors, and the inspection supervisor who carry out the duties of the IDDE Program. This involves following up on reported illicit discharges and proactively doing commercial and industrial site surveys. The inspectors immediately report any illicit discharges found and the manager follows up with the owner to eliminate and remediate the issue. IDDE field data sheets, inspection photos, and support documents such as emails and letters, are saved in hard copy as required by law, and in digital format to the County's IDDE database and/or local network servers. All IDDE

screenings, surveys, inspections and enforcement actions are recorded, tracked, and reported to MDE each year in the NPDES MS4 Annual Report.

Enhanced IDDE Program

During the outfall sampling effort, Howard County's contractor was ready to collect grab samples for analysis of nutrient and bacteria pollution from flowing outfalls for potential enhanced IDDE pollution reduction credits. However, the only flowing outfall that was identified had a positive field test only for chloride and detergents, and therefore was not eligible for enhanced IDDE pollution reduction credits.

Ongoing Enforcement Efforts

LKQ: Howard County continues to proceed with enforcement against LKQ Pick Your Part/Potomac German Auto/Baltimore Auto Recycling, an automotive scrap yard, for discharge of oil, automotive fluids, sediments, and auto parts to Dorsey Run, a tributary of the Patuxent River. To date, Howard County has issued two NOVs and seven citations to both the owner (Baltimore Auto Recycling) and operator (LKQ Pick Your Part/Potomac German Auto) of 8125 Washington Boulevard, Jessup. A Circuit Court Consent Order issued on 2/21/19 requires the defendants to thoroughly drain fluids from their vehicles, provide drip pans to customers, post signs requiring drip pan use, comply with MDE Permit 12SR2262, submit a soil stabilization plan, and submit a timeline for construction of stormwater management treatment facilities. Litigation is continuing in both the Circuit Court (for enforcement of the Consent Order) and District Court (for enforcement of the citations issued for violations on 4/23/19, 5/6/19, and 5/17/19). Howard County is in close communication with the MDE Water and Science Administration Compliance Program on this case.

Roberts Property: Howard County continues to monitor the enforced cleanup of a property privately owned by James Roberts in ElkrIDGE Maryland. This has now become a joint operation with MDE. Violations found on the property include scrap cars, tanks, refrigerators, improperly stored materials as well as an abundance of other violations noted by inspectors. Howard County will continue to work closely with MDE to bring this site into compliance with local, state, and federal law.

4. Litter and Floatables

This section of the permit requires Howard County to address problems associated with litter and floatables in waterways that adversely affect water quality. Increases in litter discharges to receiving waters have become a growing concern both nationally and within Maryland and cannot be ignored. Howard County needs to evaluate current litter control problems associated with discharges from its storm drain system and develop and implement a public outreach and education program as needed on a watershed by watershed basis.

- a. As part of Howard County's watershed assessments under PART IV.E.1 of this permit, Howard County shall document all litter control programs and identify potential sources, ways of elimination, and opportunities for overall improvement.***
- b. Within one year of permit issuance, as part of the public education program described in PART IV.D.6., Howard County shall develop and implement a public education and outreach program to reduce littering and increase recycling. This shall include:***

- i. Educating the public on the importance of reducing, reusing, and recycling;*
 - ii. Disseminating information by using signs, articles, and other media outlets; and*
 - iii. Promoting educational programs in schools, businesses, community associations, etc.*
- c. Evaluating annually the effectiveness of the education program.*
- d. Submit annually, a report which details progress toward implementing the public education and outreach program. The report shall describe the status of public outreach efforts including resources (e.g., personnel and financial) expended and the effectiveness of all program components.*

Annual Update Number 25 Status

Recycling Division Programs

Howard County Recycling Division continues to provide many recycling opportunities and information to County residents and businesses, as well as County government operations. In 2019, a total of 229,626 tons of recyclables were recycled by businesses and residents. Of that, 36,042.76 tons of recyclables were collected curbside and 21,666.96 tons through drop-off programs at Alpha Ridge Landfill.

Weekly residential single stream recycling collection is provided to over 85,000 single family homes, townhouses, mobile home parks and condominiums. Six collection routes also have food scrap collection available to them – including one that was added in September 2019. The Alpha Ridge Landfill Residents’ Convenience Center accepts a wide variety of recyclable materials including: paint, reusable household items, food scraps, compressed gas tanks, electronics, rigid plastics, cardboard, foam padding, mattresses and box springs, reusable building materials, Styrofoam™, cooking oil, motor oil and filters, anti-freeze, wet cell batteries, clothing and textiles, tires, scrap metal and appliances, reusable bicycles, oyster shell, and single stream recycling. Wood waste, yard trim, manure, and other organics are collected in separate areas at the landfill for processing. All County residents may use the convenience center with proof of residency. Businesses may also use the center for recycling if the materials originated in the County. On-going recycling events include paper shredding, Christmas tree recycling, backyard composting, and a variety of other education and outreach programs geared towards audiences of all ages. Single stream recyclables are collected from County buildings and facilities on a weekly schedule; County agencies also bring items to Alpha Ridge Landfill for recycling such as wood debris and yard trim.

The County provides education and outreach to the public on the importance of waste reduction, reusing, and recycling through disseminating information in the following manners:

- During FY20, the Recycling Division distributed a significant amount of recycling and waste reduction literature to households and businesses that emphasizes reducing, reusing, and recycling. In addition, material was available through local libraries, public buildings, and events. Outreach to businesses and residents was also achieved through the County’s website, www.HowardCountyRecycles.org.
- A monthly e-newsletter is sent to 23,500 residents. Residents opt-in to receive this newsletter which highlights holiday schedule changes, shredding events, tips, and updates on the recycling program. Recent newsletters can be found at www.HowardCountyMD.gov/NewsAndUpcomingEvents
- Print ads relevant to the importance of reducing, reusing, and recycling promoted to the public in the following:
 - Armed Forces Directory
 - Association of Community Services Guide

- Baltimore Sun
- Epoch Newspaper
- Howard County Chamber of Commerce Directory
- Howard County Fair Catalogue
- Howard County Visitors Guide
- The Beacon
- The Parent's Guide to Howard County
- Senior Resource Guide
- Welcome to the Neighborhood
- Digital ads relevant to the importance of reducing, reusing, and recycling, as well as cleaning up the recycling stream to remove contaminants were run through Comcast Spotlight.
- Promotional items that encourage recycling and include recycled content are available.
- A virtual tour of the Residents' Convenience Center at Alpha Ridge Landfill was produced and is available online when physical tours are not possible. www.HowardCountyMD.gov/ARL
- Recycling and waste reduction literature was distributed at libraries, schools, County buildings, community associations, senior centers, and businesses and directly to individuals. Brochures can also be found on the County's Recycling website at www.HowardCountyRecycles.org
- Regular outreach through social media such as Twitter, using the Twitter account [@HoCoRecycles](https://twitter.com/HoCoRecycles) promotes recycling, composting, and waste reduction.

The County's Recycling Coordinators provide educational programs in schools, businesses, community associations, etc. These efforts include:

- Participating in community, school, and corporate events with a recycling exhibit and educational materials.
- Continued distribution of school recycling information through school programs, brochures, and visually appealing lunchroom recycling posters in public and private schools for all age groups.
- Presentations and tours at the Alpha Ridge Landfill.
- The School Board and the County continue to collaborate on a collection contract for trash and recycling. Collection is provided weekly for trash and recycling from lidded dumpsters as well as collection from wheeled, lidded carts for single stream recycling at all HCPSS schools and facilities. Seven schools participate in the food scrap collection program; collected food scraps are composted at the County composting facility.
- Technical support provided as requested to businesses throughout Howard County. A section on specialty recycling along with business recycling options has been posted on the website at <https://www.howardcountymd.gov/Departments/Public-Works/Bureau-Of-Environmental-Services/Recycling/Business-Recycling>.
- Continued promotion of recently developed education campaigns to encourage proper recycling (www.KnowBeforeYouThrow.org) and reduce wasted food (Food for Thought).

Adopt-A-Road Program/Trash Collection

The County "Adopt-A-Road" volunteer program continues to be very successful. The Adopt-A-Road Summary in Table 3 below, provides a breakdown of the different zones for the Adopt-A-Road program FY20, that details the amount of trash collected, the mileage of road adopted, and the number of roads adopted by zones. More information about the Adopt-A-Road program can be found on the County's website:

<https://www.howardcountymd.gov/Departments/Public-Works/Bureau-Of-Highways/Adopt-A-Road-Program>

Table 3: Adopt-A-Road Summary

Zone	Trash Bags Collected	Number of Roads Adopted	Estimated Miles Cleaned
Central	787	35	29
East	967	30	72
West	753	19	36
Total	2,507	84	137

Howard EcoWorks Channel Maintenance Program

Howard EcoWorks removed 1584 lbs of litter from county streams during channel clearing efforts within the reporting period.

Howard EcoWorks regularly collects trash when doing tree maintenance work on County Forest Conservation Areas and stream restoration projects. There are currently 20 sites where Howard EcoWorks has done or continues to do this work. Volume and weight of litter collected are not tracked during these projects.

Office of Community Sustainability (OCS) Litter Removal and Education Efforts

OCS implements the 20 Minute Cleanup, a litter removal and awareness project. From 2016-2019, over 9,660 volunteers participated in this litter removal project. Due to COVID-19 and the Stay At Home Order, the 20 Minute Cleanup was not held in 2020. OCS also assists DRP with stream cleanups such as Project Clean Stream and International Coastal Cleanup.

OCS oversees the use of the local version of the storm drain stencil, which reminds residents not to litter or put anything down stormdrains with the message “Only Rain Down the Drain. Drains to Patapsco [or Patuxent].” Over 400 drains were stenciled between 2016-2020.

Department of Recreation and Parks Programs

Natural Resources Division

Stream and Pond Cleanup Program

- Since 1996, the Department has actively recruited volunteers and tracked their efforts removing trash and other debris from Howard County's waterways. In FY2019, we had 12 volunteers spend 41 hours in this program. Volunteers collected 352 pounds of trash and an additional 1,250 pounds of bottles, cans, tires and scrap metal were recycled. Since 1996, we have had 2,670 people spend 5,937 hours cleaning our waterways. These figures reflect the Department's participation in the Baltimore regional stream and watershed clean-up effort, “Project Clean Stream”. This was the eleventh year the Department participated in the “International Coastal Clean-up” providing one location. Since 2000, 44.36 miles of streams/rivers and 102.2 acres of lakes and ponds areas have been cleaned. Trash collected since 2000 totals 34,466 pounds with an additional 22,944 pounds of trash recycled! Because of Covid19, Project Clean Stream was cancelled in April, 2020.

Park Operations

- Zone 1 has over 7 miles of pathway and natural trails that border waterways in the Middle and Little Patuxent river valleys. Staff spends approximately 300 hours annually keeping trails and paths open, repairing erosion and reducing sedimentation deposits on these arteries. Much of this work is to slow down stormwater runoff in riparian areas. In January 2020, in conjunction with DPW, Zone 1 made repairs to stop stormwater erosion deposits resulting in sinkhole hazards and clogged stormwater drains from parkland runoff caused by outfall from athletic fields. One hundred twenty tons of stone were strategically placed in drainage swales to slow down stormwater and reduce erosion deposits. Collective effort costs to DPW and Parks budget = \$6,500.00.
- Zone 2 has 11 pavilions that are rented 7 days a week during the summer. Staff spend 8 hours a day pulling trash and recycle cans from pavilion usage. Additionally, staff pick up loose trash from the roadways and approximately 2.6-mile pathway at Centennial Park. Zone 2 average trash pick per year is 51,000 pounds and 51,000 pounds of recycling.
- Zone 3 handles the refuse task by emptying 132 cans and 83 recycle cans seven days a week. Several manhours are also spent picking up all loose trash within the Zone. This aids in the effort to keep our streams and waterways clean.
- Zone 4 spends over 2,000 hours picking up loose trash throughout the parks and emptying lined trash cans and recycling cans. The public is provided with an equal number of trash and recycling cans paired throughout each park and parking lot managed by zone 4.

Natural and Historic Resources Division

Park Ranger Programs

The Park Ranger Program conducts interpretive programs throughout the year. These programs are an outreach initiative committed to expanding environmental literacy, educating the public on natural resource topics and encouraging stewardship of the environment. Multiple program topics relate to current efforts, including:

- *The Fall Foliage Hike*, which teaches the basics of tree identification, the importance of forest buffers, and the benefits of trees, as well as showcases native species along the Middle Patuxent River
- *The Reptiles Walk* and *Emerging Amphibians Walk* take patrons through wetland parks while exploring the wonderful world of turtles, snakes, and frogs, and providing information about the importance of wetlands, indicator species, and factors that influence pollution and flooding.
- *Read with a Ranger*, where Park Rangers read books to children ages 0 to 8 years relating to conservation and stewardship
- *Mutt Strut*, an engaging walk with Park Rangers, the public, and their dogs, where we take the opportunity to educate dog owners about the importance of responsible ownership and picking up after their pets in order to keep harmful bacterial loads out of our water systems. Mutt Strut is associated with our umbrella program *Bark Ranger* (See also – Proper Pet Waste Management).
- Park Rangers assist Trout Unlimited with their *Trout in the Classroom* Program. On field days when students release their trout into the river, we have a river walk and discussion about the importance of riparian buffers, sources of runoff, pervious and impervious surfaces, the water quality aspects that trout and other species need to thrive, pollution, and ways that the participants can mitigate harmful human behaviors that negatively impact water quality. Over 300 students of elementary, middle school, and high school ages participate in Trout in the Classroom annually. **Trout in the Classroom activities did not take place in the Spring of 2020 due to COVID-19.**

Park Ranger Volunteer Events

Park Rangers manage volunteer trash pick ups as part of the Park Watch volunteer program. One of the components of Park Watch is stewardship of natural resources. In 2019 we hosted two trash clean up volunteer events along the Patuxent Branch Trail.

Howard County GreenFest

- FY2019 was the thirteenth year for the County to host its annual *GreenFest*. The theme this year was “50 Years of Earth Day” and featured many exhibits and vendors dealing with tree plantings, energy efficient home improvements, rain barrels, gardening and composting and the Maryland/DC Breeding Bird Atlas. Other features included many community groups focused on environmental awareness. Since the beginning, attendance has reached over 204,300 people. Because of Covid19, GreenFest 2020 became a virtual event.

Innovative Recycling Programs and Demonstrations

Robinson Nature Center

Robinson Nature Center has numerous demonstration areas and partners with local and regional groups to promote programs that recycle organic materials for uses consistent with mitigating stormwater runoff and sediment discharge.

- **Demonstration Areas**

- **Composting Demonstration Area** – Robinson Nature Center currently houses a compost demonstration area off our parking lot that shows various methods for composting. Members of the public can join Master Gardeners one day each month from May through October to learn more about composting and receive a free compost bin kit if they reside in Howard County.
- **Rain Garden Demonstration Area** – Robinson Nature Center has four different rain gardens on the property with two of them in locations the public frequently accesses. These rain gardens showcase for our visitors how including this type of landscape feature can reduce stormwater runoff from impervious surfaces as well as reducing run-off that would lead to erosion along steeper grades.
- **Pervious Paving Demonstration Area** – Robinson Nature Center’s main parking area is composed of pervious pavement which allows visitors to see the difference between run-off on the main circle drive (asphalt to ensure durability for heavy vehicle traffic) and the pervious pavement.

- **Recycling and Waste-Reduction Initiatives**

- **Snack-wrapper Recycling** – Begun at Robinson Nature Center, Howard County Department of Recreation and Parks (HCRP) collected foil-lined wrappers for recycling through The Clif Bar recycling program with TerraCycle. Since beginning collection in 2017, HCRP diverted more than 39,000 wrappers for recycling this way. This program ran through February 2020.
- **EcoArt Residency** – After launching in 2018, Robinson Nature Center’s Eco-Artist in Residence , Sarah Causey, a painter and illustrator, finished her work completing a total of four pairs of outdoor receptacles for waste in which nature murals draw awareness to landfilling and recycling. Both in the colors used on the bins – brown for trash and blue for recycling, as well as the stencils marking the bins with the trash bins now denoted with the word “Landfill” and the image of a truck dumping garbage, the program aims to encourage low-waste habits through raising the consciousness of visitors to Robinson around the disposal of waste.

- **Oyster Shell Recycling** - Since 2013, Robinson Nature Center has partnered with the Oyster Recovery Partnership to be an official drop-site for oyster shell recycling. Members of the public can drop their oyster shells at the Center's shell recycling caddy and staff from the ORP retrieves the shells for use in oyster reef recovery programs in the Chesapeake. The recycled shells provide substrate upon which new oysters can grow, thus helping revitalize the oyster population and its valuable ecosystem service of filtering the waters of the Chesapeake Bay. As of February 2020, Robinson Nature Center had provided just over 118 bushels of shell for recycling. That's enough shell to grow more than 500,000 baby oysters to be planted back into the Chesapeake Bay.
- **Composting & Compostable dishware**- Since 2013, Howard County Master Gardeners have held free compost demonstrations at the Center during which residents of the County are provided with instructions on how to create and manage their own backyard compost piles. Howard County's Office of Recycling provides free compost bins to residents at these demonstrations. The residential composting operations allow families to use organic, natural fertilizer in place of commercial and chemical fertilizer. Beginning in January of 2018, Robinson Nature Center switched from disposable to compostable dishware for programming use. Through that initiative, we have composted over 247 pounds of food and dishware waste. Since April 2019, the Nature Center designed compostable dishware packages for birthday parties and rentals. These packages allow those renting the building for an event or party the option of having the Nature Center supply compostable dishware for their event and reduce the event's waste/ec footprint.
- **Public Programming, School Field Trips and Events at Robinson Nature Center**
In FY2020, Robinson staff led 257 programs (including 52 field trips, 205 public programs, 22 camps, 11 scout programs, as well as 91 birthday parties). These programs engaged 13,576 participants. Mission-driven programming connecting participants to their natural resources is a key component of the Nature Center's goals and promotes environmental stewardship to all generations. Key programs of note contributing to education on issues such as stormwater runoff, recycling, pollution management and integrated pest management include:
 - Field Trips for elementary and secondary students including *World to A River Dweller*,
 - *Water Works, It's Easy Being Green, Battlefield Earth and Water, Water Everywhere*
 - Summer Camps including *River Explorers, Lil' Acorns In, Around and Under the Water and Forces of Nature*
 - Special Events including *Wild for Water Day, Earth Day Puppet Theater, Annual Anniversary Open House* and *Urban Pallet Paint Night*
 - *Family River Romps* during the summer
 - *Early Childhood Nature Education – Getting Little Feet Wet* teacher training
 - An online public film screening of *Conservation Kids* and a *Pollinator Walk and Beekeeper Q & A*

Park Operations

- Zone 1 is taking steps to comply with new restrictions enacted on recycling by reducing the recycling containers in our park sites and adding regular trash receptacles. Existing recycle containers will be amended to only accept bottles and small articles to eliminate contamination to assist recycling plant operations by reducing contaminants .
- To promote recycling, Zone 2 maintains thirty-five recycle containers and collected approximately 51,600 pounds of recyclables. Four new water fountains have been installed with water bottle fillers to allow patrons to reuse water bottles and reduce one time use recyclables.

- Zone 3 promotes recycling by frequently updating information in kiosks throughout the parks within the zone. Zone 3 is also taking steps to comply with new restrictions enacted on recycling by reducing the recycling containers in our park sites and adding regular trash receptacles.
- To promote clean recycling within Zone 4, recycle cans are paired with trash cans. Our recycling efforts will soon become limited stream in an attempt to avoid contamination.

Disseminating information by using signs, articles, and other media outlets

- The Robinson Nature Center facility educates the public about green technologies, sustainability, environmental stewardship, and techniques that can help reduce stormwater runoff, as well as reducing water and energy consumption:
- Stormwater mitigation is achieved on the property through a pervious concrete parking lot, four separate bioretention/rain gardens and a green roof. These items are highlighted on our LEED tours which we offer by group reservation as well as during special events throughout the year. The parking lot is vacuumed as needed during the year to maintain its pervious nature. Our maintenance staff monitors and maintains the plantings within the four bioretention areas. We have continued to provide annual maintenance of our rain gardens. The pervious concrete parking lot, green roof, and rain gardens are also highlighted for visitors with interpretive signs.
- Interpretive signage in the building and on the center's grounds describe to visitors how different features reduce the environmental impact of the building by mitigating stormwater runoff and minimizing water and electricity use.
- A backyard demonstration area shows the public what they can do on their own properties to improve the management of water. Rain barrels demonstrate catchment of water for use in the garden and native plants demonstrate low-maintenance landscaping.
- The Chesapeake Bay exhibit (one of three permanent exhibits in the building) educates the public about water quality issues. A scaled reproduction of the Bay covering the floor of the exhibit allows visitors to walk the connections between Howard County and the Bay. Through interactive displays, visitors learn about the plight of oysters, how products they use can contribute to storm water runoff issues and how they can help save the Bay.
- We operate a touch tank filled with aquatic animals in our Children's Discovery room. This tank serves as an extension to our Chesapeake Bay watershed exhibit and further demonstrates how bodies of water are connected to surrounding land. Our educators and volunteers interpret the dependence of aquatic animals on our land use decisions that affect the quality of their habitat. Extensions of these concepts are also shared through discovery carts through which volunteers share stories and information about oysters and horseshoe crabs, two prominent species in the Chesapeake Bay, with our visitors.
- In FY2020, Robinson Nature Center hosted 27,404 visitors through the building. These numbers are lower than usual due to facility closure as a result of the COVID-19 pandemic.

Promoting educational programs in schools, businesses, community associations

Natural and Historic Resources Division

Students Branching Out

- In the spring of 2013 the Howard County Recreation and Parks partnered with the Office of Sustainability to apply for a grant from the Chesapeake Bay Trust. The purpose of the grant was to combine efforts at improving water quality and stream health with student education. \$373,100 was awarded to be used by June 30th, 2015 for the involvement of students in planting 6,300 trees on a total of 47.5 acres.
- In the fall of 2013 further funding was requested to expand the Students Branching Out project. An additional \$448,000 was granted to plant 8,000 more trees on 40 acres of school property and parkland by 2015. The Department of Public Works and the Howard County School System joined Recreation and

Parks and Office of Sustainability to strengthen the outcome of the project by bringing together various areas of expertise.

- While the grant ended in 2015 The Department of Recreation and Parks and the Department of Community Sustainability want to continue planting efforts on school properties, partnering with teachers and students, as funding allows. Funding will come from Turf to Trees and Stream ReLeaf programs, so tree totals will be reported through those programs.
- During the Fall of 2017 100 students planted 50 trees at Our Lady of Perpetual Help in Ellicott City and in the Spring of 2018 75 trees were planted with 25 students at Mt. Hebron High School.
- In the Fall of 2018 50 trees were planted with 50 students at Oakland Mills High School and 169 trees were planted with 200 students at Mayfield Woods Middle School.
- In the Fall of 2019 150 trees were planted with 240 students at Mt. View Middle School and in the Spring of 2020 75 trees were planted at Centennial High School without students due to COVID 19.

Year Students Engaged

Spring 2017- 165

FY2018- 125

FY2019- 250

FY2020- 240 (Students were not present for Spring 2020 planting due to COVID 19)

Total- 780

Robinson On the Road Program

In 2018, Robinson Nature Center began offering in-school/off-site programs. These programs allow us to reach a new demographic from schools that don't have the transportation, staffing, or financial resources to take field trips to the Nature Center. Our 3-5th grade program called, "Virtual Power Tour" uses virtual reality (VR) goggles to immerse participants into the world of renewable and non-renewable energy practices. During the VR experience, participants travel to the bottom of the ocean floor, where they learn about oil extraction and discuss conservation of finite resources. In FY2020, Robinson ran four Robinson on the Road programs serving 275 students from four different schools.

Robinson Nature Center Treasure Chests

In 2018, Robinson Nature Center began offering a variety of rentable education trunks including a Water Resource and Heritage, Nature Treasure Chest. This trunk provides renters with many educational activities, lessons, learning experiences, and water related artifacts, all centered around the many resources that the Chesapeake Bay provides. Our Nature Treasure Chests were booked twice in FY2020.

Robinson Nature Center MAEOE Green Leaders

Green Leaders (Maryland Association for Environmental and Outdoor Educators, Trained Robinson Staff) work with Howard County Schools throughout the year, serving as a source of information and guidance for schools as they complete their Green School Application. A large portion of the Green School Application involves schools embracing student led, sustainable practices, which include Water Conservation/Water Pollution Prevention, Habitat Restoration, and Solid Waste Reduction, among others. In FY2020, Robinson Green Leaders provided approximately 48 hours of guidance and support for Green Schools.

Robinson Nature Center Educator/Teacher Trainings

In the winter of 2020, Robinson staff led two professional development workshops: Getting Little Feet WET and Growing Up WILD. These curriculum trainings provide formal and non-formal educators with strategies and lessons to engage young children in lessons focused on water conservation, habitat conservation, and ecology. There were a total of 20 participants.

Community Outreach/Partnerships

- Attended a community outreach event “A Coral Reef Encounter” at McGaskill Commons Pool raising awareness about the importance of coral reefs and healthy oceans and their connections to local water quality and watersheds. Approximately 300 people attended.
- Outreach staff and a volunteer participated in Howard County Public Library’s first Hi-Tech STEAM Carnival at the East Columbia Library. Over 1,000 people attended, engaging in STEM activities including water experiments.
- Shared information about Robinson and volunteer opportunities at Howard Community College’s “Sustainability Day”, speaking to approximately 100 people.
- Outreach staff hosted a 25 tourism partners at a “Visit Howard County Tourism” group sales breakfast meeting, including a tour and introduction to Robinson’s sustainable building and grounds for attendees.
- Funding was secured from two private donations to purchase and install a water bottle filling station on Robinson’s grounds. These stations promote bottle reuse and decrease waste and littering in parks. Due to COVID-19, the filling station installation has been delayed.

5. Property Management and Maintenance

- a. *Howard County shall ensure that a Notice of Intent (NOI) has been submitted to MDE and a pollution prevention plan developed for each County-owned municipal facility requiring NPDES stormwater general permit coverage. The status of pollution prevention plan development and implementation for each County-owned municipal facility shall be reviewed, documented, and submitted to MDE annually.*
- b. *The County shall continue to implement a program to reduce pollutants associated with maintenance activities at County-owned facilities including parks, roadways, and parking lots. The maintenance program shall include these or MDE approved alternative activities:*
 - i. *Street sweeping;*
 - ii. *Inlet inspection and cleaning;*
 - iii. *Reducing the use of pesticides, herbicides, fertilizers, and other pollutants associated with vegetation management through increased use of integrated pest management;*
 - iv. *Reducing the use of winter weather deicing materials through research, continual testing and improvement of materials, equipment calibration, employee training, and effective decision-making; and*
 - v. *Ensuring that all County staff receives adequate training in pollution prevention and good housekeeping practices.*

The County shall report annually on the changes in any maintenance practices and the overall pollutant reductions resulting from the maintenance program. Within one year of permit issuance, an alternative maintenance program may be submitted for MDE approval indicating the activities to be undertaken and associated pollutant reductions.

Annual Update Number 25 Status**Bureau of Environmental Services (BES)****County Facilities – Notice of Intent (NOI)**

The County has identified and listed County owned and municipal sites needing a permit below. Stormwater Pollution Prevention Plans (SWPPPs) are reviewed annually, updated as necessary, and placed in the associated SWPPP binder.

County Landfills

As required by the industrial NPDES discharge permits, Howard County DPW monitors surface discharge from groundwater treatment systems. The County maintains General Industrial NPDES Discharge permits from MDE for New Cut and Carrs Mill landfills and an Individual Industrial NPDES Discharge permit with Stormwater for Alpha Ridge Landfill. Alpha Ridge Landfill is the only site under the NPDES permit that has stormwater requirements. The other two sites do not have stormwater requirements associated with their NPDES permits.

Alpha Ridge – The current State Discharge Permit #13-DP-3224, NPDES Permit #MD0067865 is effective as of 2/1/15, expired on 1/31/20, and is administratively continued until MDE issues a new permit. Howard County submitted a renewal application to MDE for this permit on January 16, 2019. This permit required Howard County to apply for coverage under General Permit 12-SW. Howard County submitted the NOI and SWPPP for General Permit 12-SW on 8/5/15. MDE then assigned Registration of Application No. 12SW3054 and NPDES No. MDR003054 to this site. The landfill is still active, but the majority of Howard County's solid waste is transferred out of state to Virginia. Alpha Ridge Landfill still buries a small amount of the overall waste generated within the County. The transfer station has been operational since September 2005. The installation of the groundwater remediation system was completed in 2000 and has been operating since that time.

Park Equipment Maintenance Shops and Fueling Facilities

The MDE Wastewater Permits Program has agreed that the following park maintenance shops and fueling facilities are not required to apply for coverage under General Permit 12-SW. However, Howard County will continue to implement the BMPs identified in the previous SWPPPs at these sites.

- Cedar Lane Park Equipment Maintenance Shop
- Centennial Park Equipment Maintenance Shop
- Corridor Road Fueling Facility
- Rockburn Branch Park Equipment Maintenance Shop
- Savage Park Equipment Maintenance Shop
- Schooley Mill Equipment Maintenance Shop
- Western Regional Park Equipment Maintenance Shop

County Facility Wash Racks

In August 2011 a review of vehicle washing efforts at County fire stations, police stations, and several County parks identified the need for better treatment for vehicle wash water, in particular when vehicles are washed outside. As part of the design the County will harvest rainwater for use in vehicle washing operations. Construction is complete at all seven fire and police station locations. Design is complete for two park locations. The entire budget for design and construction is approximately \$4.8 million.

See list below of the status of all the vehicle wash pad/rainwater harvesting systems.

Table 4: Howard County Vehicle Wash Pad/Rainwater Harvesting Sites

Facility	Address	Vehicle Washing	Industrial Activities
Alpha Ridge Landfill	2350 Marriottsville Rd Marriottsville, MD	Y - wash water is directed to sanitary sewer	Y - SWPPP
Banneker Fire Station (#7)	5815 Banneker Rd Columbia, MD	Y - indoors only	N
Bethany Fire Station (#8)	9601 Old Frederick Rd Ellicott City, MD	Y - wash water is directed to sanitary sewer	N
Cedar Lane Park Maintenance Shop	5081 Cedar Lane Columbia, MD	N (washpad under design)	N
Centennial Park Maintenance Shop	10000 Route 108 Ellicott City, MD	Y – wash water is contained, pumped out, and delivered to the Recreation & Parks HQ wash bay	N
Central Maryland Transit Operations Facility	8800 Corridor Rd. Annapolis Junction, MD	Y - indoors only	Y - SWPPP
Clarksville Fire Station (#5)	5000 Signal Bell Lane Clarksville, MD	Y - indoors only	N
Cooksville Maintenance Shop	14212 Frederick Rd Cooksville, MD	Y - wash water is captured and trucked to WWTP	Y - SWPPP
Dayton Maintenance Shop	4301 Route 32 Dayton, MD	Y-wash water is captured and trucked to WWTP	Y - SWPPP
Elkridge Fire Station (#1)	5700 Rowanberry Drive Elkridge, MD	Y-washwater is directed to sanitary sewer	N
Ellicott City Fire Station (#2) Ellicott City, MD	4150 Montgomery Rd Ellicott City, MD	Y - wash water is directed to sanitary sewer	N
Glenwood Fire Station (#13)	14620 Carrs Mill Rd Woodbine, MD	Y - wash water is recycled	N
Lisbon Fire Station (#4)	1330 Woodbine Drive Lisbon, MD	Y - indoors only	N
Long Reach Fire Station (#9)	5950 Tamar Drive Columbia, MD	Y - wash water is directed to sanitary sewer	N
Little Patuxent Water Reclamation Plant	8900 Greenwood Place Savage, MD	Y - wash water is directed to sanitary sewer	Y - SWPPP
Mayfield Maintenance Shop	7751 Mayfield Ave. Elkridge, MD	Y - wash water is directed to sanitary sewer	Y - SWPPP
Public Safety Training Center	2200 Scott Wheeler Dr Marriottsville, MD	Y – wash water is directed to sanitary sewer	N

Recreation & Parks Headquarters	7120 Oakland Mills Rd Columbia, MD	Y - indoors only	Y - SWPPP
Ridge Rd. Maintenance Shop	8800 Ridge Rd. Ellicott City, MD	Y - indoors only	Y - SWPPP
Rivers Park Fire Station (#10)	10155 Old Columbia Rd Columbia, MD	Y - indoors only, outdoor washpad under construction	N
Rockburn Branch Park Maintenance Shop	6105 Rockburn Branch Park Rd. Elkridge, MD	N	N
Savage Fire Station (#6)	8521 Corridor Rd Savage, MD	Y - wash water is directed to sanitary sewer	N
Savage Park Maintenance Shop	8400 Fair St. Savage, MD	N	N
Scaggsville Public Safety Complex (#11)	11226 Scaggsville Rd Laurel, MD	Y - washwater is directed to sanitary sewer	N
Schooley Mill Park Maintenance Shop	12975 Hall Shop Rd Highland, MD	N (washpad under design)	N
Utilities Maintenance Shop	8250 Old Montgomery Rd Columbia, MD	Y - wash water is directed to sanitary sewer	Y - SWPPP
West Friendship Fire Station (#3)	12535 Old Frederick Rd Sykesville, MD	Y - wash water is directed to sanitary sewer	N
Western Regional Park Maintenance Shop	15040 Carrs Mill Rd Woodbine, MD	N	N

County Wastewater Treatment Plant (LPWRP)

There was a total of four spills from July 1, 2019 through June 30, 2020. Two spills were required to be reported to MDE and two did not.

1. July 17, 2019 – Approximately two gallons of wet biosolids were spilled on the pavement near a storm drain from the trailer of a Synagro truck. The spill was surrounded with an absorbent sock and some absorbent material was put on the spill area. All was shoveled up and put into a 5-gallon bucket and dumped back into the truck. The absorbent sock was disposed at a landfill with our screened sewer waste. Not reported to MDE.
2. November 6, 2019 – approximately 500 gallons of liquid sludge and polymer were spilled inside the centrifuge building and the paved area behind the building. All drains in this area go to the head of the plant. The spill was vacuumed up and dumped at the headworks of the plant and the area was hosed down the drain which goes back to the headworks. Not reported to MDE.
3. November 1, 2019 – Approximately 14,000 gallons of treated effluent was discharged, prior to disinfection, to a storm drain that drained to the Little Patuxent River. A power outage caused treated effluent to flow over a weir into the basement of the filtration building. The building sump pump system pumped the water out of the building to the pavement, which drained down to the storm drain, which drained to the Little Patuxent River. Because it was dark, this was not noticed until daybreak, when the sump pump was shut off. This spill was reported to MDE.
4. February 27, 2020 – Approximately 4,200 gallons of primary clarifier wastewater overflowed the scum pit at Primary Clarifier 5 onto the ground. The water ran down the hill to Outfall C and into the Little Patuxent River. The spill impacted the grass area around PC5 and Outfall C. The grass areas of the spill were

vacuumed up and discharged at the headworks of the plant. The deposited material was shoveled up and sent to landfill. Lime was added to the entire area of the spill. This spill was reported to MDE.

There were 299,008,000 gallons of Reclaimed Water sent to the National Security Agency from July 1, 2019 through June 30, 2020.

Annual Inspections

Plant inspections for the SPCC Plan are completed on a bimonthly schedule by EA in conjunction with plant personnel. Any significant findings are reported to the Bureau of Environmental Services with corrective actions and follow-up correspondence. Each inspection is scanned and saved at LPWRP. Below are a couple items that were noted and fixed:

- Tank 002A was called out in the June inspection as needing a grounding wire. This item has been completed.
- Tank 004A was reported in the June inspection as needing an anti-syphon valve. This item has been completed.
- All other items reported were minor and fixed immediately.

Plant inspections for the SWPPP are completed on a quarterly basis. All findings are recorded, and reports are sent to Environmental Services and saved at the LPWRP. Below are items that need to be addressed:

- The Guilford Run waterway is reported as having logs and debris that need to be removed. This was mentioned in both the last 2 plant inspections. A completion date of 7/31/20 has been proposed.
- Outfall A is reported as having a log that needs to be removed from the discharge pathway. This was mentioned in the last inspection and a completion date of 7/31/20 is proposed.

Pollution Prevention and Good Housekeeping Practices Training

For all industrial permits listed below, SWPPPs have been developed for each site and employees are trained annually, at minimum. Each year County staff is required to attend training which includes the SPCCs, the SWPPPs, IDDE and handling hazardous wastes. In-person training for FY20 was conducted in February and March 2020. Due to the pandemic shutdown, employees at the Dayton Shop, the Mayfield Shop, the Central Maryland Regional Transit Facility, the Radio Shop, and some of the Little Patuxent Water Reclamation Plant staff did not attend the training sessions. They will take online training classes as staffing allows.

The following inspections are conducted at the facilities covered by the industrial permits:

- Alpha Ridge Landfill
 - Weekly inspections of drainage areas which include un-stabilized landfill areas, active land application areas, material storage, and waste exposed to precipitation.
 - Monthly inspections of the rest of the drainage areas.
 - Quarterly facility inspections of the entire site.
 - Quarterly visual monitoring inspections of flow from each outfall. This was required to start in the first full quarter after the County was notified of coverage under 12-SW, which was the fourth quarter of calendar year 2015.
 - Quarterly Benchmark monitoring of the outfalls from drainage areas that include Sector L: Landfill and Land Application Sites, and Sector C: Chemicals and Allied Products (the composting facility). Benchmark monitoring was required to begin in the first full monitoring period six months after the County was notified of coverage under 12-SW, which was the second quarter of calendar year

2016. With MDE approval, benchmark monitoring was discontinued at three outfalls in the Sector L drainage area because they had met all the benchmark values. Therefore the County now monitors only one outfall for Total Iron and TSS.

- Annual Comprehensive Site Compliance Evaluation (CSCE or Annual Inspection) of the entire site.
- All Other Sites
 - o Quarterly facility inspections of the entire site.
 - o Quarterly visual monitoring inspections of flow from each outfall.
 - o Annual Comprehensive Site Compliance Evaluation (CSCE or Annual Inspection) of the entire site.

Reports of the inspections described above are included as narrative files included in the geodatabase.

Bureau of Highways (BOH)

The Bureau of Highways (BOH) is responsible for addressing a number of issues concerning pavement, sidewalks, storm drains, and trees along more than 1,000 miles of County roads for the convenience and safety of the public. This work includes preservation efforts such as road crack-sealing and tree trimming, and remedial efforts such as County road snow removal and filling potholes. Some of the areas of operation that the BOH has focused on during the current permit year are described below.

Street Sweeping

The BOH has continued performing street sweeping with the assistance of a private contractor. Street sweeping occurs on 806 miles of the County's approximately 1,376 miles of curbed roadways. During the period of July 1, 2019 through June 30, 2020, the BOH collected approximately 801.59 tons of street debris via street sweeping. Each street is swept three to four times a year. Each sweeping cycle takes from six to nine weeks to complete. Cycles generally begin in the months of January, April, July and September. In general, each cycle begins in the east part of Howard County and moves westward.

Inlet and Pipe Cleaning

The BOH cleans and repairs storm drain inlets and pipes as needed or as complaints are reported. This work is performed throughout the year through the use of a Vactor truck. Additionally, in the fall, the County removes leaf litter from storm drain inlets as needed.

Table 5: FY20 Inlet and Pipe Cleaning

Work Performed	Amount
No. of Inlet Repairs	32
No. of Inlet Cleaned	183
Amount of Debris from Inlet (pounds)	92,050
No. of Pipe Replacements	6
No. of Pipes Cleaned	15
No. of Drainage Swales Cleaned	2

Pesticides, Herbicides and Fertilizer

The County continues to minimize the amount of pesticides, herbicides and fertilizer used. The chemicals listed in the Chemical Application Associated Table of the geodatabase were used to control vegetation along the county's guard rails.

Snow and Ice Removal

The BOH continues to utilize and update AVL and GIS technology to record where and when de-icing chemicals were applied on county roads during winter storm events. This minimizes the possibility of inadvertent multiple applications of deicing chemicals. The chemicals listed in the Chemical Application Associated Table of the geodatabase were used to for deicing the County's roads in FY20 during three events over five days. According to the Baltimore, MD Snowfall data available from the National Weather Service Forecast Office for the Baltimore/Washington area, Howard County received approximately 1.8 inches of snowfall during the 2019-2020 winter season. MD Snowfall data are available online at:

<http://www.weather.gov/media/lwx/climate/bwisnow.pdf>.

Table 6: FY20 BOH Snow & Ice Removal Material

	Salt (tons)	Liquid Magnesium (gal)	Salt Brine (gal)
Total:	10,980	2,825	80,109

Snow and Ice Removal Training

The BOH holds a Snow Rodeo event every October which Highway staff are required to participate. At this event staff use their skills to navigate through a course for them to drive a full-size snow plow through narrow pathways while missing all obstacles. In addition to missing obstacles the crews practice backing up without hitting a barrier, pushing a log into a designated slot. This event is a fun activity that also allows the County snow plow/salt truck drivers to hone their skills and make them more efficient during actual snow/ice events.

Department of Recreation and Parks (DRP)

Street Sweeping

The parking lot at Robinson Nature Center is vacuumed as needed during the year to maintain its pervious nature. Our maintenance staff monitors and maintains the plantings within the four bioretention areas.

Inlets Inspection and Cleaning

Zone 1 staff maintains a variety of inlets, storm drains, and swales within their respective sites. There are over 40 storm drains that are located within Zone 1. Zone 1 has 9 bioretention ponds within park boundaries, most of which are located adjacent to or on paved areas. These retention ponds require maintenance care to remove invasive plants, trash, and debris. Staff assists DPW with this collective effort to ensure proper function of these retention areas. One hundred twenty hours are spent in this effort annually. In 2020 Zone 1 removed 40,000 square feet of invasive and woody vegetation from our stormwater ponds to ensure proper functions to comply with environmental assessment site inspections.

Zone 2 has spent 124 hours annually to inspect and clean forty-one inlets receiving drains to maintain stormwater systems on parkland. Large inlets and stormwater pipe outflows are cleared by Department of Public Works, where the scope of work is beyond our capabilities.

In Zone 3, the pond crew comes out annually to mow and remove the woody growth from the stormwater pond area and swales. Our staff conducts quarterly inspections, approximately 8 hours a year, to check for holes created by burrowing animals, and to ensure there is no evidence of runoff from sediments. Assessing Inlet box conditions are also part of the inspection process.

Zone 4 spends an average of 120 hours per year (10 hours per month) on inlet inspection and maintenance at Rockburn Branch Park and several community parks. Troy Hill Park, with its addition of numerous bioretention ponds and swales throughout the most recent phases of construction, has required over 400 manhours of maintenance since this year. Maintenance on the bioretention structures at Troy Hill Park have been completed by Zone 4 employees and the Land Management Division.

Pesticides, Herbicides and Fertilizer

The Department of Recreation and Parks has eliminated the use Glyphosate.

The Park Operations Division is adhering to recommended fertilizer use requirements in compliance with Maryland Department of Agriculture. Park Managers are tailoring custom management plans for individual fields based on soil analysis. By incorporating granular slow release nutrients that are dictated by analysis results, managers now have the flexibility to modify and limit inputs to precisely what is necessary for resilient turf.

Zone 1-In March 2020, Glyphosate applications have been eliminated from parkland use for post-emergent weed control. Organic concentrations of vinegar and citric acid, a derivative of citrus fruits, are now being used for post-emergent weed control. Three months into the growing season, an additional 240 hours of labor have been used to control weeds as a result of the changes.

Zone 2-Pesticide usage has been reduced by 50% in regional and community parks. Glyphosate is no longer being used by the Department. Alternative organic solutions are being tested by the Department. Problematic landscape beds were removed and landscape fabric was installed to reduce frequent herbicide applications. Additionally, Zone 2 has been using mechanical equipment for removal of weeds in curbs and sidewalk areas.

- Zone 3 manually removes and spot sprays invasive weeds. Pesticide usage has been reduced by 20% at regional and community parks with no usage of Glyphosate.
- Certified Pesticide Applicators attend a yearly Pesticide Update run by the State.
- Registered Pesticide Applicators attend an "In-House" Pesticide Training annually.
- Certified Nutrient Applicators attend a yearly Nutrient Update run by the State. Zone 3 did not apply fertilizer this year and only spot-treated hand-seeded areas.

Zone 4 Since the use of Glyphosate has been eliminated from Department use, Zone 4 has not used any pesticides this season. The zone makes every effort to hand pull or trim weeds. An additional 300 hours of labor have been used to control weeds as a result of the changes.

- Certified Pesticide Applicators attend a yearly Pesticide Update run by the State.
- Certified Nutrient Applicators attend yearly Nutrient Update run by the State. **Zone 4 has not applied any fertilizer this fiscal year.**
- Registered Pesticide Applicators attend an "In-House" Pesticide Training annually.

Snow and Ice Removal

Park Operations used motorized equipment, hand tools, and ice-melt materials to clear snow and ice from park roadways, pathways, ball courts, and school pathways. When possible, an organic corn-cob derivative product called “Dri-Zorb” is used in place of granular calcium chloride.

School pathway deicing efforts have been handed over to one crew. This crew has been trained in the proper calibration of the equipment used. The formation of this crew has reduced wasted materials as there is one sole group focused on all the areas and they are able to monitor the walks more closely and effectively, which maximizes efficiency.

No Idle Zone

In November Robinson Nature Center implemented a No Idle Zone in our front parking loop. We installed two signs provided as part of this MDE initiative. In all letters confirming field trip bookings, we explained the no idle zone and asked that bus drivers be reminded to turn off their engines while loading and unloading children on field trips. We have also notified and trained all staff to adhere to the No Idle Zone.

Pollution Prevention and Good Housekeeping Practices

- Staff attend annual Site Environmental workshop.
- Staff adhere to all standards regarding hazardous material handling and spill response.
- Regular inspections of material storage and spill remediation are conducted through Clean Harbors. This is intended to identify and improve social, economic, and environmental impacts. Adherences to these standards help prevent the release of hazardous material into the environment.
- Centennial Maintenance Shop has installed four spill cleanup stations to collect fluid spills from equipment leaks and fluid fill areas. Vehicles are equipped with small spill kits for spills that could potentially occur during transport of small fluid containers. A monthly SWPPP report is filed with the Waste Management Division. One thousand pounds of spill waste has been collected and removed from the Maintenance Shop since implementing the stations. (Note- this total reflects a 750-pound reduction in the spill waste from FY19.)
- Vehicles and equipment are cleaned off-site at designated facilities equipped with wash bays reducing runoff from park operation maintenance sites.
- SWPPPs are in place for the Schooley Mill Park and Western Regional Parks Maintenance Facilities. These are monthly inspections/reports to monitor water runoff from the maintenance yards. They also include yearly inspections on the condition of the sediment ponds and inlet boxes affiliated with these maintenance yards.
- A SWPPP is in place to ensure that runoff around Rockburn’s maintenance shop is eliminated. The plan was created by Environmental Services who conducts inspections two times a year and trains staff on proper protocols for maintenance and vehicle cleaning.
- The Zone cleans paint machines in proper locations and also cleans turf carts and trucks whenever possible. All spills are properly cleaned up and pig mats are used when we are aware of machine leaks.

6. Public Education

Howard County shall continue to implement a public education and outreach program to reduce stormwater pollutants. Outreach efforts may be integrated with other aspects of the County’s activities. These efforts are to be documented and summarized in each annual report. The County shall continue to implement a public outreach and education campaign with specific performance goals and deadlines to:

- a. Maintain a compliance hotline or similar mechanism for public reporting of water quality complaints, including suspected illicit discharges, illegal dumping, and spills.*
- b. Provide information to inform the general public about the benefits of:*
 - i. Increasing water conservation;*
 - ii. Residential and community stormwater management implementation and facility maintenance;*
 - iii. Proper erosion and sediment control practices;*
 - iv. Increasing proper disposal of household hazardous waste;*
 - v. Improving lawn care and landscape management (e.g., the proper use of herbicides, pesticides, and fertilizers, ice control and snow removal, cash for clippers, etc.);*
 - vi. Residential car care and washing; and*
 - vii. Proper pet waste management.*
- c. Provide information regarding the following water quality issues to the regulated community when requested:*
 - i. NPDES permitting requirements;*
 - ii. Pollution prevention plan development;*
 - iii. Proper housekeeping; and*
 - iv. Spill prevention and response.*

Annual Update Number 25 Status

Compliance Hotline

The Howard County website posts a Hotline number, (410) 313-6447, which residents can call to reach the Bureau of Environmental Services. Managers and inspectors responsible for the County's IDDE program respond to these calls within 24 hours, Monday through Friday. Complaints that come in during the weekend are referred to 911 or the 24-hour MDE Spill Hotline at (866) 633-4686.

Complaints include but are not limited to illicit discharges, dumping, and spills. All complaints are kept in a database. The County website also hosts an illicit discharge form that visitors can fill out and send directly to the manager of the IDDE Program. In addition, the County also is part of Tell HoCo, a customized SeeClickFix smartphone application that allows anyone in Howard County to report an illicit discharge directly to the IDDE Manager.

Increasing Water Conservation

Robinson Nature Center

The Robinson Nature Center, in operation since September 2011, serves as a model of innovative water conservation methods and officially received its LEED Platinum certification by the USGBC in 2012. Innovative water conservation methods incorporated into the building and property include:

- In FY20 more than 250 native perennials and grasses were planted and mulched and will continue filtering runoff pollution, recharging local groundwater and improving water quality throughout the Middle Patuxent watershed.
- Efficient landscapes including four rain gardens and a green roof all utilizing native and perennial plants. Native plantings planted throughout the property including in the center's backyard demonstration area

serve as educational models for residents. Existing native plantings continue to be monitored and maintained through regular volunteer weeding events and replaced as needed when predation occurs. These plantings reduce the need for irrigation, pesticides, herbicides, etc. while providing a habitat for wildlife.

- Working with local nurseries and volunteers, the center planted almost 200 new native trees and shrubs along hillsides and surrounding portions of the trail to further enhance soil stabilization in these areas.
- Storm drains located along the Cedar Lane entrance of the Nature Center have “Chesapeake Bay Drainage” stenciled onto them, helping to educate visitors and passersby about the importance of proper disposal of pollutants that could affect local waterways and wildlife.
- Since 2012, the Nature Center had participated as a host site for “Project Clean Stream”, a Baltimore regional stream and watershed cleanup effort. While in past year’s we have hosted successful cleanups in conjunction with this program, it was scheduled to take place in FY2020 during the state Stay at Home order and, therefore, did not occur. In FY2019, 55 volunteers assisted Nature Center staff in removing 440 pounds of trash. This bested the previous 300 pounds from FY18. Litter was removed from the floodplain, bordering open space land, and from debris that has accumulated and washed downstream from heavy rainfalls into the Middle Patuxent River.
- Using the building as a teaching tool – the Robinson Nature Center facility educates the public about green technologies, sustainability, environmental stewardship, and techniques that can help reduce stormwater runoff, as well as reducing water and energy consumption. Water use reduction is achieved in the publicly accessed spaces of the building using waterless urinals and high efficiency toilets and faucets.
- Stormwater mitigation is achieved on the property through a pervious concrete parking lot, four separate bioretention/rain gardens, and a green roof. These items are highlighted on our LEED tours which we offer by group reservation and during special events throughout the year. The parking lot is vacuumed as needed during the year to maintain its pervious nature. Our maintenance staff monitors and maintains the plantings within the four bioretention areas. The pervious concrete parking lot, green roof, and rain gardens are also highlighted for visitors with interpretive signs.
- Interpretive signage in the building and on the center’s grounds describe to visitors how different features reduce the environmental impact of the building by mitigating stormwater runoff and minimizing water and electricity use.
- A backyard demonstration area shows the public what they can do on their own properties to improve the management of water. Rain barrels demonstrate catchment of water for use in the garden and native plants demonstrate low-maintenance landscaping.
- The Chesapeake Bay exhibit (one of three permanent exhibits in the building) educates the public about water quality issues. A scaled reproduction of the Bay covering the floor of the exhibit allows visitors to walk the connections between Howard County and the Bay. Through interactive displays, visitors learn about the plight of oysters, how products they use can contribute to storm water runoff issues and how they can help save the Bay.
- A touch tank filled with sea creatures is in our Children’s Discovery room. This tank serves as an extension to our Chesapeake Bay exhibit and further demonstrates how bodies of water are connected. Our educators and volunteers interpret the dependence of aquatic animals on our land use decisions that affect the quality of their habitat. Extensions of these concepts are also shared through docent carts through which volunteers discuss oysters and horseshoe crabs, two prominent species, in the Chesapeake Bay.
- In FY2020, Robinson Nature Center hosted 27,404 visitors through the building. These numbers are lower than usual due to facility closure as a result of the COVID-19 pandemic.

Environmental Quality Incentives Program (EQIP)

The USDA, NRCS continued to work with the HSCD to administer EQIP, the main conservation cost-share program available to farmers and farm owners from the federal agriculture department. The following practices were installed in the County through this program:

- (2) 4,410 square feet High Tunnel
- (3) 5.9 acre Forage and Biomass Planting
- (4) 8,673 linear feet Non-Stream Fencing
- (2) 8 each Watering Facility
- (2) 16,669 linear feet Livestock Pipeline
- (1) 1 each Stream Crossing
- (1) 1 each Sediment Control Pond
- (4) 15.6 acre Prescribed Grazing
- (4) 37,877 linear feet Animal Trails and Walkways
- (1) 1 each Animal Waste Storage Structure
- (1) 1085 linear feet Stream Fencing
- (2) 1.1 acre Critical Area Planting
- (3) 1.2 acre Mulching
- (2) 16.8 acre Brush Management
- (2) 0.61 acre Heavy Use Area Protection

Practices Completed with State or Local Cost Share or Without Cost Share Assistance

These practices were completed with technical assistance from the HSCD. Some projects received cost sharing from either Maryland Agriculture and Water Quality Cost Share (MACS) program or Patuxent Reservoirs Watershed Protection Group local cost-share program while other practices received no cost-share.

- (1) 1 each Watering Facility
- (1) 2 each Grade Stabilization Structure
- (15) 2174.6 acres Cover Crop
- (1) 1 each Stream Crossing
- (2) 50.8 acre Prescribed Grazing
- (4) 1.85 acre Grassed Waterway
- (2) 2 each Sediment Control Pond

Conservation Planning

In providing technical assistance, the HSCD writes conservation plans. Plans are also written for land that is proposed for the agricultural land preservation program. Also, existing preservation parcels have conservation plans that may be updated. There were 17 new conservation plans on 2,938.27 acres and 9 revised conservation plans on 862.52 acres written by the HSCD office.

Environmental Stewardship

Through a partnership with the National Security Agency (NSA), Howard County Little Patuxent Water Reclamation Plant (LPWRP) is delivering highly treated wastewater (reclaimed water) to be utilized as cooling water for national security technology. Much of the water will be evaporated during the cooling process.

Discussions are on-going with other industrial facilities to utilize reclaimed water for process use which would replace potable water. Additionally, an engineering study has begun to design a reclaimed water distribution system to deliver reclaimed water to those industries.

A carbon-neutral power backup system was created at the Plant, which includes the combination of solar panels and diesel generators to ensure the Plant operates in all weather conditions and avoids potential overflows.

LPWRP personnel attend the Howard County Fair and Howard County GreenFest to hand out information on the treatment plant and on how to keep the sewers from getting clogged and causing overflows. This information includes: proper disposal of grease, which is a consistent cause of sewer flow issues; proper disposal of prescription drugs; and a “Do Not Flush” campaign for disposable baby wipes.

Stormwater Management – The effort that began in 2016 to review, rehabilitate, and update the stormwater collection system on the LPWRP property was continued in FY2019.

- January 2019 - Highways crew cleaned swales and cleared storm drain pipes along perimeter road.
- April 2019 – HTI completed replacement of storm drain pipes A and P; installed rip raps on outfalls Q, I, J & K; removal of sediment accumulation on one of the three (3) culvert pipes.
- May 2019 – Maintenance crew removed sand and clay from new trench drains.

Residential and Community Stormwater Management Implementation and Facility Maintenance

Rain Barrel Program

The SWMD generally provides residents with free barrels through the County’s Rain Barrel Program. Pre-drilled rain barrels are available free of charge to residents who attend seminars, either at the Alpha Ridge Landfill or at the County’s GreenFest event in April. During the first two quarters of FY20, 56 rain barrels were given away at the Alpha Ridge Landfill. Unfortunately, due to COVID-19 restrictions, both GreenFest and the giveaways at the Landfill were cancelled, and no rain barrels were given away during the last two quarters of FY20.

Residential Pool Discharge

Howard County mailed out three letters to residential pool owners advising them of the requirements for draining pools (correct pH, drain slowly, and lower disinfection levels to less than 0.40 mg/L).

Middle Patuxent Environmental Area (MPEA)

- The MPEA Integrated Natural Resources Management Plan for the 1,021-acre environmental area was initially drafted in June 2000, and was last updated in January 2020. The plan outlines strategies, techniques and protocols for environmental education and research, nature-related recreation, natural resources management, and administration. The plan is updated annually.
- The implementation of the plan’s projects and programs in FY2020 has included the following accomplishments:
 - 935 volunteer hours were spent maintaining 5.5 miles of trails, conducting wildlife and stream surveys, controlling invasive exotic vegetation, planting native trees and shrubs, and assisting with the managed deer hunts in the MPEA.
 - Implementation of the MPEA Woodcock Habitat Management Plan to restore breeding habitat for American woodcock and other early-successional species within the Middle Patuxent River watershed continued as an ongoing project in FY2020. In spring 2020, an additional acre of non-native, invasive autumn olive was restored to native early successional habitat to benefit

woodcock and other meadow/shrub-scrub species. Maintenance will include invasive species control, supplemental planting of native species, and winter mowing.

- An additional 258 native trees and shrubs were planted in MPEA in FY2020. MPEA staff and Conservation Stewardship Program volunteers worked to maintain native tree and shrub planting sites from previous seasons. Tree shelter maintenance, invasive removal and monitoring was conducted on 2,738 native trees and shrubs previously planted in MPEA stream buffers and upland habitats.
- The MPEA Independent Trail Maintenance Team volunteer program contributed 375 hours in FY2020, with much of the time being spent on trail brushing and on the installation and maintenance of drainage and erosion control structures. Check dams and water bars were installed and maintained along trails through riparian areas where trail erosion was evident.
- Between the Conservation Stewardship and the Weed Warriors programs, a total of 245 volunteer hours were contributed to the removal of non-native, invasive plant species and replanting of native trees and shrubs within the environmental area.
- MPEA staff completed a systematic evaluation of all 35 storm drain outfalls within the environmental area in 2010, and in 2011 an additional 38 storm drain outfalls outside but impacting the area were inspected. Outfalls were placed into severity rating categories as follows: 1 – fairly good (about 50%), 2 – slight to moderate erosion (17%), 3 – slight to moderate erosion with severe stream bank erosion downstream (14%), 4 – moderate to severe erosion; unstable; some impact to infrastructure (14%), 5 – infrastructure damaged/under repair (5%). During the evaluation, one storm drain outfall with severe erosion and infrastructure damage was referred to the SWMD and was repaired in 2012 using a regenerative stormwater conveyance design. This project now serves as a demonstration site for innovation in SWM techniques. In 2013, MPEA staff trained volunteers from the Middle Patuxent Environmental Foundation to repeat the original storm drain outfall surveys. 2013 data were compared to the baseline data from 2010 in order to monitor whether the outfalls were stable or if the erosion was progressing and to recommend actions to minimize future erosion. In FY2019, an additional outfall stabilization project was completed at Bright Passage. In FY2020, MPEA staff continued to monitor outfalls for erosion and monitored the three repaired outfalls at New Country Lane, Great Oak Way, and Bright Passage for function, tree planting success, and invasive species control.
- A volunteer from the Howard County Legacy Leadership Institute for the Environment (HOLLIE) completed work on conducting macroinvertebrate stream surveys on all 17 tributaries and the mainstem of the Middle Patuxent River within the MPEA in 2011. In 2012, a subsequent volunteer continued work on the project with data analysis and creation of a PowerPoint presentation on the results, plus a synopsis of the Middle Patuxent Watershed's scope, stakeholders and education and monitoring strategies. In 2013, a Watershed Stewards Academy graduate used these data in a public presentation, entitled "Slow the Flow", at the Robinson Nature Center. In FY2020, MPEA volunteers continued to build on previous work with ongoing stream monitoring and stream habitat assessments, and are building towards greater outreach to neighborhoods and HOAs.

Commercial/Non-residential

Commercial Credit and Reimbursement Program

During this time period, the Office of Community Sustainability continued the commercial credit and reimbursement program. Eligible property owners were awarded a credit against the Watershed Protection

Fee for on-site stormwater management. Before the July 2020 Fee was issued, 70 commercial properties had been approved for credit. There have been no commercial reimbursements granted to date.

Commercial Stormwater Solutions Work Group

In the spring of 2016 the Howard County Executive formed a work group of commercial property owners, consulting engineers, commercial property managers, and the University of Maryland Environmental Financing Center. Staff continues to pilot some of the recommendations of the 2016 Commercial Stormwater Work Group. During this time period, the County pursued partnerships with commercial properties to install projects similar to the partnership with Wal-Mart in Ellicott City to retrofit their pond in 2018. Wal-Mart contributed almost ¼ of the costs toward the project. The County is using this partnership as a model and reaching out to other commercial property owners for more stormwater retrofit partnerships.

Non-Profits

Watershed Protection Partnership

During this period, the Office of Community Sustainability continued the Non-Profit Watershed Protection Partnership (NPWPP). In this Partnership, the County grants a 100% credit to non-profits in exchange for the ability to assess for and implement stormwater management projects on their properties. This program not only accomplishes impervious surface management, but also involves key stakeholders in the stormwater remediation problem, thus increasing public buy-in. There are 238 parcels in the NPWPP, which totaled to approximately \$94,485 of Watershed Protection Fee credits during fiscal year 2020. While the number of Partners increased by one, the credit amount is lower due to the legislation that capped the Fee for all nonresidential properties at a decreasing percentage down to 5% in FY19. The County continues to work with nonprofit partners to implement and retrofit stormwater facilities as finances allow.

Residential

CleanScapes

Since an estimated 40% of impervious surface in Howard County is located on residential properties, a residential stormwater program was created. The CleanScapes program, administered by the Office of Community Sustainability, offers County residents reimbursement for installation of stormwater Best Management Practices (BMPs) and credit toward the Watershed Protection Fee. During fiscal year 2020, \$28,712.64 in reimbursements were granted to 18 residents. At the end of fiscal year 2020, a total of \$5,023.25 was credited to 212 residents. The CleanScapes program also includes periodic public events and promotional materials to improve public education and buy-in. By the end of fiscal year 2020, approximately 5.9 acres of impervious surface were treated by stormwater BMPs on residential lots through the CleanScapes program.

In FY20, 12 rain gardens were installed through the Rain Gardens for Clean Water (RG4CW) program treating approximately 0.32 acres of imperviousness. Over the lifetime of the RG4CW program we have installed 52 gardens treating 1.5 acres of impervious. We have \$75,000 in funding to spend during FY21 and this will be the last year of the program. Howard County is combining CleanScapes and RG4CW into one program. On June 1st 2020 the County Council passed a resolution to increase the reimbursement rates for installing stormwater practices. This increase includes increased maximums for all practices and covers 75% of the project cost, where it was previously 50%.

Septic Savers

The Office of Community Sustainability (OCS) coordinated with the Health Department, Bureau of Utilities and the staff at the water treatment plant to develop the Septic Savers Program that promotes proper septic maintenance. Residents can go to the County's website to learn about the benefits of properly maintaining their septic tanks and can request a \$100 reimbursement when they pump their septic tank every 3-5 years. Septage hauling records from the treatment plant along with invoices from the haulers are used to verify the residents' request for reimbursement. During FY20, 734 residents received the reimbursement (some of which was funded through FY19 earmarked funds).

Proper Erosion and Sediment Control Practices

Construction Inspection Division

The Construction Inspection Division (CID) responds to citizen complaints as they relate to development projects under construction. Often times when addressing citizen complaints, it becomes a public education opportunity describing the situation, and BMP practices used to address their concerns as they relate to stormwater are explained.

Soil Conservation District

When county residents who reside on private property are having issues with erosion and/or drainage, the Soil Conservation District staff is contacted. A District staff member will meet with the resident to review the issues and consider options. The District will then put together a recommendation report for the resident with recommendations to repair and prevent additional erosion or drainage issues.

Increasing Proper Disposal of Household Hazardous Waste

The County provides a multifaceted approach to proper management and diversion of household generated hazardous waste. These includes a brochure and web page highlighting what is accepted at the County's permanent drop off program at Alpha Ridge Landfill Resident's Convenience Center, along with ways to minimize through safe alternative products other than standard household chemicals. Brochures are available at County buildings and libraries. During the reporting period, over 550,000 pounds of hazardous waste was collected from over 10,200 residents at the Alpha Ridge Landfill Resident's Convenience Center.

Improving Lawn Care and Landscape Management

Compost Demonstration Program & Compost bin give-away

Howard County Master Gardeners held free compost demonstrations and lessons throughout the County. Attendees were instructed on how to create and manage their own backyard compost piles. Howard County's Recycling Division provides free compost bins to residents at these demonstrations and additionally makes them available for pickup at the Alpha Ridge Landfill Resident's Convenience Center and the Bureau of Environmental Services office in Columbia. Approximately 482 compost bins were distributed in FY20. Additionally, staff at Robinson Nature Center, Roger Carter Community Center, and Miller Library actively compost food scraps generated by staff.

Stream ReLeaf

The Stream ReLeaf Program was initiated by the Howard County Stormwater Management Division (Department of Public Works) in 2003 as part of the implementation of the Little Patuxent River Watershed Restoration Action Strategy. The Program has grown and expanded in scope significantly over the years and is now managed by the Natural Resources Division of the Department of Recreation and Parks.

Stream ReLeaf is a program designed to enhance riparian (stream) buffers by providing free native trees and shrubs to homeowners. The homeowner commits to planting the trees and shrubs on their property and the County delivers the requested plants. Requirements for the program are as follows: the area that the homeowner is willing to plant must be within 75 feet of a stream (right of ways are not eligible); and the homeowner must commit to planting at least 12 trees. Past performance is presented in the table below.

Table 7: Stream ReLeaf Summary

Year	Number of Participants	Number of Trees Planted
CY 2003	8	103
CY 2004	15	468
CY 2005 ¹	1	150
CY 2006	37	1,374
CY 2007	31	1,208
CY 2008 ²	28	709
CY 2009	25	1,908
CY 2010 ³	11	367
CY 2011	81	1,780
CY 2012	32	1,166
CY 2013	69	2,353
CY2014	55	2,281
CY2015- FY2016	32	1150
FY2017	13	700
FY2018	9	479
FY2019	12	584
FY2020 *	9	1,304
Total	466	17,950

*No spring 2020 plantings due to COVID-19

Turf to Trees

The Turf to Trees program was created in 2016 and is a partnership between the Department of Recreation and Parks and the Office of Community Sustainability. The goal of the program is to aid property owners of lots sized 1.5 to 10 acres with little canopy coverage to convert lawn to forest. The Department of Recreation and Parks meets with interested homeowners to create a planting plan, species list and map out the boundaries of the planting. The County provides the trees and planting labor to qualifying homeowners free of cost. The homeowner must commit to the maintenance of the trees.

Table 8: Turf to Trees Summary

Year	Number of Participants	Number of Trees Planted
FY2017	16	2,062
FY2018	14	1,264
FY2019	28	2,195
FY2020 *	14	940
Total	72	6,461

*FY2020- Limited spring plantings due to COVID-19

Residential Car Care and Washing

Public Education

Residential car care and car washing topics are included in presentations to the public and outreach activities at schools. The County has spoken to the Howard County Public Schools regarding the car wash fundraisers that were being done by many schools. An explanation of the IDDE program and what can and cannot enter the storm drain system was provided. In general, school car wash fundraisers have stopped.

Proper Pet Waste Management

The Bark Ranger Program

In the summer of 2013, the Park Rangers of Howard County Recreation and Parks implemented a new educational initiative. "Bark Ranger" encourages patrons to clean up after their pets, specifically dogs, and to use a leash while visiting a Howard County parks. Dog feces left on the ground is unsightly, negatively impacts our ground and surface water, and attracts rodents. It is important to keep your dog on a leash. Not only is it the law, but it is important to protect wildlife, and be considerate to the other park patrons. We encourage the public and their pooches to take the pledge and be committed to protecting our environment. Currently the program has over 3,529 participants signed up that have taken the Bark Ranger pledge:

*My Human and I care about our environment and the safety of others around us.
We pledge to do our "doodie" and clean up after ourselves.
I will remain on my leash by my Human's side at all times.*

As part of the Bark Ranger pledge, participants receive a Bark Ranger cloth bandana and a plastic bone which contains baggies to remove pet excrement. Through this initiative, visitors of Howard County Recreation and Parks facilities are made aware of the negative environmental impact that pet feces have. Those who participate are appreciated for the "dirty jobs" of pet-ownership and rewarded with a small token.

Information Provided to the Community

The County provides various stormwater quality information to the community related to:

- NPDES Permitting Requirements
- Pollution Prevention Plan Development
- Proper Housekeeping
- Spill Prevention and Response

This information is provided when requested through presentations, mailings, telephone conversations, and one-on-one discussions in person.

Other Public Outreach and Education:

Water Reporter

The HCPSS Watershed Report Card program for 9th grade students successfully utilized Water Reporter in the fall of 2019 to track their water quality monitoring data and share through the interactive map feature. We continue to encourage residents to use Water Reporter to share stream conditions and post Stream Mapper reports.

Storm Drain Stenciling

The Office of Community Sustainability developed a storm drain stencil with a local message, “Only Rain Down the Drain: Drains to Patuxent River/Patapsco River” to remind residents that materials dumped in storm drains will result in degradation of local water bodies. To date, over 460 drains have been stenciled by local groups including: homeowners associations, Eagle Scouts, Boy Scouts, Girl Scouts, Howard Community College, Howard County Public Schools, Howard County Watershed Stewards Academy, Baltimore Aircoil Company, and the READY program. The message itself will remind passersby not to pollute, but has also educated the volunteers stenciling the drains and the communities witnessing the projects. Storm drain stenciling was put on hold in March 2020 due to COVID-19 social distancing requirements.

Community Groups

The Office of Community Sustainability participates in several groups which educate the public about stormwater management, most prominently: Howard EcoWorks, the Howard County Watershed Stewards Academy (WSA), the Watershed Improvement Network (WIN), the Howard County Earth Forum, the Watershed Report Card Program, the Maryland Water Monitoring Council (MWMC), the Sierra Club, and Transition Howard County.

Health Department

The Howard County Health Department continues to maintain information on its webpage noting that old prescriptions and medicines should not be poured down the drain or flushed since it may negatively affect the quality of streams, waterways, and the Bay. As part of the on-going Bay Restoration Fund (BRF) grant program, the Health Department continues to identify, prioritize, and inspect qualifying properties with failing septic systems, coordinating the connecting of qualifying homes currently on septic systems within the Metropolitan District, plus evaluating system upgrades for possible acceptance into the grant program. State legislation effective November, 2016, enables non-critical area counties (including Howard) the ability to exercise flexibility in requiring Best Available Technology (BAT) units for all new construction. This flexibility has helped enable a better targeted application of BRF funding, while leaving in place public health priorities. This has resulted in a reduction of BAT unit installations in the county since that time. The current grant award of \$194,000 (including an initial and supplemental award) is through June 2020. Proposals to MDE will be prioritized upon readiness to proceed and benefit to the public and groundwater. MDE, through HB12 legislation, has established criteria for additional funding to cover administrative costs of the BRF program for each county based upon county agreed to levels of support. MDE released an updated grant agreement for FY2020 and FY2021 with additional homeowner notifications (enforcement provisions) and database updates/verifications as conditions of a grant award. Two tiers of support (tied to the number of existing BAT systems installed) replaces the former 3 tier system. Howard County has secured funding through FY 2021 for the lower level support (up to \$57,000 each year based upon MDE certification). The new agreements also provide an opt out (termination clause) should the enhanced workload prove problematic for existing staffing levels. Howard County received \$57,000 in this additional BRF money in FY2020. During the fiscal year, the Health Department sent letters to homeowners who were overdue for BAT service.

E. Restoration Plans and Total Maximum Daily Loads

In compliance with §402(p)(3)(B)(iii) of the CWA, MS4 permits must require stormwater controls to reduce the discharge of pollutants to the MEP. By regulation at 40 CFR §122.44, BMPs and programs implemented pursuant to this permit must be consistent with applicable WLAs developed under EPA approved TMDLs (see list of EPA approved TMDLs attached and incorporated as Attachment B).

Howard County shall annually provide watershed assessments, restoration plans, opportunities for public participation, and TMDL compliance status to MDE. A systematic assessment shall be conducted and a detailed restoration plan developed for all watersheds within Howard County. As required below, watershed assessments and restoration plans shall include a thorough water quality analysis, identification of water quality improvement opportunities, and a schedule for BMP and programmatic implementation to meet stormwater WLAs included in EPA approved TMDLs.

1. Watershed Assessments

- a. By the end of the permit term, Howard County shall complete detailed watershed assessments for the entire County. Watershed assessments conducted during previous permit cycles may be used to comply with this requirement, provided the assessments include all of the items listed in PART IV.E.1.b. below. Assessments shall be performed at an appropriate watershed scale (e.g., Maryland's hierarchical eight or twelve-digit sub-basins) and be based on MDE's TMDL analysis or an equivalent and comparable County water quality analysis.**
- b. Watershed assessments by the County shall:**
 - I. Determine current water quality conditions;**
 - II. Include the results of a visual watershed inspection;**
 - III. Identify and rank water quality problems;**
 - IV. Prioritize all structural and nonstructural water quality improvement projects; and**
 - V. Specify pollutant load reduction benchmarks and deadlines that demonstrate progress toward meeting all applicable stormwater WLAs.**

Annual Update Number 25 Status

Under Howard County's current MS4 permit (Part IV.E.1), the County is required to develop Watershed Assessments to assess current conditions and to identify restoration opportunities to address pollutant reductions in approved TMDLs. In accordance with this requirement, Howard County's SWMD sponsored assessments of the Little Patuxent and Middle Patuxent Watersheds in 2015 which were reported on in AR20. In 2016 the County completed assessments in the Patuxent watersheds (Brighton Dam, Patuxent River Upper, and Rocky Gorge Dam) and the Patapsco watersheds (Patapsco River Lower North Branch, Patapsco River South Branch) thereby completing assessments of all of the County's watersheds. The County scheduled public meetings in late January of 2017 to introduce the assessment results and provide the assessments for a 30-day comment period. No comments were received. The County continues to perform restoration projects from the Watershed Assessments as projects that will provide water quality improvement and impervious area surface restoration.

2. Restoration Plans

- a. Within one year of permit issuance, Howard County shall submit an impervious surface area assessment consistent with the methods described in the MDE document "Accounting for Stormwater Wasteload Allocations and Impervious Acres Treated, Guidance for National Pollutant Discharge Elimination System Stormwater Permits" (MDE, Jun. 2011 or subsequent versions). Upon approval by MDE, this impervious surface area assessment shall serve as the baseline for the restoration efforts required in this permit.**

By the end of this permit term, Howard County shall commence and complete the implementation of restoration efforts for twenty percent of the County's impervious surface area consistent with the methodology described in the MDE document cited in PART IV.E.2.a. that has not already been restored to the MEP. Equivalent acres restored of impervious surfaces, through new retrofits or the retrofit of pre-2002 structural BMPs, shall be based upon the treatment of the WQ_v criteria and associated list of practices defined in the 2000 Maryland Stormwater Design Manual. For alternate BMPs, the basis for calculation of equivalent impervious acres restored is based upon the pollutant loads from forested cover.

- b. Within one year of permit issuance, Howard County shall submit to MDE for approval a restoration plan for each stormwater WLA approved by EPA prior to the effective date of the permit. The County shall submit restoration plans for subsequent TMDL WLAs within one year of EPA approval. Upon approval by MDE, these restoration plans will be enforceable under this permit. As part of the restoration plans, Howard County shall:***
 - I. Include the final date for meeting applicable WLAs and a detailed schedule for implementing all structural and nonstructural water quality improvement projects, enhanced stormwater management programs, and alternative stormwater control initiatives necessary for meeting applicable WLAs;***
 - II. Provide detailed cost estimates for individual projects, programs, controls, and plan implementation;***
 - III. Evaluate and track the implementation of restoration plans through monitoring or modeling to document the progress toward meeting established benchmarks, deadlines, and stormwater WLAs; and***
 - IV. Develop an ongoing, iterative process that continuously implements structural and nonstructural restoration projects, program enhancements, new and additional programs, and alternative BMPs where EPA approved TMDL stormwater WLAs are not being met according to the benchmarks and deadlines established as part of the County's watershed assessments.***

Annual Update Number 25 Status

To meet the requirements under section IV.E Restoration Plans and Total Maximum Daily Loads, Howard County developed several related projects in 2015-2016. First are the watershed assessments conducted in the Little Patuxent and Middle Patuxent watersheds (2015) and the assessments for the Patuxent and Patapsco watersheds (2016) which were described in previous annual reports. The Countywide Implementation Strategy, or CIS, was developed in 2015 as the County's overall Restoration Plan. The County updated the CIS in December of 2017 based on MDE comments, the County's approved impervious baseline, updates to the County's programs and strategies, and County progress made through FY17.

The CIS included three major elements:

1. Impervious Area Assessment – to set the County's total jurisdictional impervious area, the total treated impervious area, the baseline untreated impervious area, and the 20% restoration target.
2. Impervious Area Restoration – the CIS establishes the current progress and the planned project and programs needed to meet the impervious restoration by the end of the permit in December 2019.
3. TMDL Restoration – the CIS establishes the current progress and the planned project and programs needed to meet the County's stormwater wasteload allocation (SW-WLAs) with cost, schedule, and final dates for meeting each required reduction.

The CIS is not updated and resubmitted with this FY20 annual report. The County is using other planning and reporting mechanisms to continue its planning and tracking efforts including the impervious restoration accounting analysis and reporting (*Howard County Impervious Restoration Accounting: Methodology and Results*), annual MS4 reports that include updates on implementation and modeled pollutant load reductions, and individual TMDL plans for new TMDLs finalized after the CIS update in 2017.

Impervious Area Assessment

As a requirement of section PART IV.E.2.a of the National Pollutant Discharge Elimination System (NPDES) Municipal Separate Storm Sewer System (MS4) Discharge Permit issued by MDE to Howard County, the County must conduct an impervious area assessment. The assessment defines the County's impervious area baseline and sets the 20% impervious area restoration goal for pre-2002 impervious acres not already restored to the maximum extent practicable (MEP). The restoration was required to be complete by December 2019, the end of the current permit term. As part of the impervious area accounting and restoration process, the MS4 Permit provides for each Phase I MS4 municipality to submit an updated and revised impervious baseline in year 4 of the current permit, which for Howard County was 2018. The revised baseline can include changes related to newly documented BMPs, updates to restoration BMP crediting, and improvements in the supporting GIS data and databases.

Previous Assessments

Howard County submitted the revised impervious baseline report (*Howard County Impervious Area Classification and Baseline Accounting: Methods and Results*) in December of 2018 with the NPDES annual report. Per comments from MDE dated August 2, 2019, MDE accepted Howard County's methodology but asked for clarification of the classification of impervious acres deducted from Howard County's baseline. In response to MDE's comments, the *Impervious Area Classification and Baseline Accounting* report was revised and resubmitted with AR24 in November of 2019. The revisions attempted to address MDE's comments, clarify the impervious area assessment, and finalize the County's baseline. The document followed the Impervious Surface Area Assessment steps laid out in Section II, steps 1 through 5 of MDE's 2014 Accounting Guidance (MDE, 2014) to determine the stormwater conveyance or system of conveyances owned and operated by Howard County and, ultimately, the impervious area that has not already been treated or restored to the MEP, or baseline, and is subject to the 20% restoration requirement. To define the delineated MS4, Howard County included the Census Urbanized Area, County-owned property and roadway right of way, and those areas that drain to and through the County's currently mapped stormwater infrastructure including outfalls, stormdrains, and stormwater BMPs. Per the 2014 MDE guidance, the County would have continuous updates to the extent of the delineated MS4 as new development and field verification are implemented throughout the County to maintain an accurate delineated area.

MDE's comments on the November 2019 version were received by the County in April of 2020. A major comment addressed the County's use of a delineated MS4 area to define the impervious areas that the County is responsible for in terms of the 20% restoration goal and stated that the area in question needed to be jurisdiction-wide.

Current and Final Assessment

Following receipt of MDE's comments on the November 2019 baseline accounting, and based on additional discussions between Howard County and MDE, Howard County chose to forgo the use of a delineated MS4 boundary and is using the jurisdiction-wide MS4, per MDE direction, for the purposes of setting the baseline, 20% impervious area restoration target, and performing the final impervious area restoration accounting for the permit

term ending in 2019. However, the County reserves the right to revisit the issue in the future should it become necessary.

The County submitted a FINAL baseline accounting methodology and results report to MDE in June of 2020, along with supplemental files and backup. The County also submitted a final version of the *Howard County Impervious Restoration Accounting: Methodology and Results* report, which addresses MDE comments on previous versions of the report, and documents the County's impervious restoration through the end of the permit term. Both reports are included as narrative files included with this AR25 submittal.

Based on the MDE accepted methods, the total MS4 impervious surface area under the County's responsibility is 15,223.4 acres as of 2002, the baseline year. The impervious baseline treated area is 4,204.5 acres, and the untreated area or area not treated to the MEP is 11,018.9 acres. Applying the 20% factor to the untreated area yields a 20% restoration target of 2,203.8 acres. These values match those reported and approved by MDE in the June 2020 baseline accounting report. A summary of the assessment per watershed is presented in Table 9. It is noted that the rooftop and non-rooftop disconnects were not analyzed per watershed, therefore the untreated and treated for each subwatershed reported below do not account for the disconnects but the total analysis at the County scale is correct.

Table 9: Impervious Area Assessment Summary in Acres

Watershed	Countywide MS4 Impervious Area	Impervious Baseline Treated	Calculated Impervious Baseline Untreated	Restoration Target (20%)
Triadelphia Reservoir (Brighton Dam)	1,377.6	95.6	1,282.0	
Little Patuxent River	7,080.1	1,558.9	5,521.2	
Middle Patuxent River	2,506.9	452.1	2,054.8	
Patapsco River L N Br	2,971.4	834.2	2,137.2	
Patuxent River Upper	311.0	108.8	202.2	
Rocky Gorge Dam	424.1	66.2	357.9	
South Branch Patapsco	552.2	13.9	538.3	
Rooftop and Non-Rooftop Disconnects	na	1,074.8	na	
Countywide	15,223.4	4,204.5	11,018.9	2,203.8

Impervious Area Restoration Progress Through December 2019

A summary of the impervious restoration progress made through the end of the County's permit term (December 17, 2019) by Howard County is included in Table 10 below and detailed in the report submitted with this annual report titled *Howard County Impervious Restoration Accounting: Methodology and Results, Revised June 2020*. Projects and programs completed after June 20, 2010 and up through the end of FY19 (June 30, 2019) and through the end of the permit term in December 2019 are considered to be restoration and are applied to meeting the 20% target. Impervious restoration calculations were made following MDE's 2014 Accounting Guidance and associated Bay Program Expert Panel reports.

Through the end of the current permit, the County has achieved credits for restoring 2,912.6 acres or 26.4% of the untreated impervious baseline. Based on these results Howard County has met its responsibility to restore 20% of its baseline within the permit term. Details of the specific projects implemented, and their associated

impervious reductions and cost can be found in the County's NPDES geodatabase submitted with this annual report.

Table 10: Impervious Area Restoration End of Permit Term Progress Summary in Acres

Watershed	Restoration Progress through End of Permit Term
Permanent Credits	
Triadelphia Reservoir (Brighton Dam)	192.7
Little Patuxent River	1,364.8
Middle Patuxent River	253.6
Patapsco River L N Br	525.3
Patuxent River Upper	0.1
Rocky Gorge Dam	9.8
South Branch Patapsco	6.9
Subtotal Permanent Credits	2,353.1
Annual Practice Credits	
Inlet and Pipe Cleaning (average FY17 to end of permit term)	67.8
Street Sweeping (average FY11 to FY19)	351.4
Septic Pump-outs (5-yr period)	140.3
Subtotal Annual Credits	559.5
Summary	
Total Countywide Impervious Restoration	2,912.6
% Impervious Treated	26.4%
Remaining Impervious Restoration Acres In Current Permit Term	0

Impervious Area Restoration Planned Progress

The County has purposely programmed more projects than necessary to reach the 20% impervious surface restoration goal of its current permit as an adaptive management measure, in the event that certain projects would have been delayed or deemed not feasible. In addition, changes in crediting rates and methods throughout the permit term led to adjustments in restoration progress calculations each year. As such, Howard County has exceeded its 20% impervious surface restoration goal by 708.8 acres or 6.4%, based on the impervious restoration calculations made following MDE's 2014 Accounting Guidance and associated Bay Program Expert Panel reports.

The County ran an analysis to determine when the 20% goal was reached. To do this, first the annual practice treatments were accounted for, including street sweeping, inlet cleaning, and septic system pump-outs. Then each permanent credit project was ordered sequentially by date of completion. In this analysis it is determined that the 20% goal was reached on March 30, 2018. Projects that were completed after the 20% goal was met and those new projects added to the analysis completed in FY20 are included in the geodatabase submitted with this annual report. It is Howard County's intention and MDE has acknowledged that any and all projects completed after the County has met its 20% impervious surface restoration goal and prior to issuance of its next MS4 permit will be credited towards the County's impervious surface restoration goals outlined in the next MS4 permit. Additionally it is the County's understanding that impervious area restoration calculations for projects completed after the 20% is met will be based on MDE's new 2020 Accounting Guidance. These calculations have not been fully completed for the next permit term, therefore the County has decided to leave blank the fields in the submitted

geodatabase for impervious restoration values for projects completed after the 20% was met. All permanently credited projects after March 30, 2018 will have blank cells in the geodatabase for the impervious acres treated. On the other hand, pollutant load reduction values (TN, TP, TSS) for these projects *are* included as those projects are continually being credited towards local TMDL compliance.

TMDL Restoration Plan

Local TMDLs

As a requirement of section PART IV.E.2.b of the County's NPDES MS4 permit, the County developed a restoration plan by December 2015 for each SW-WLA approved by EPA prior to the effective date of the permit. As noted previously, the County developed the Countywide Implementation Strategy (CIS) in 2015 (submitted with AR20) to address this requirement. A revised CIS was included with the County's AR22 submittal in 2017. It is the County's understanding based on draft and tentative determination versions of the next permit, that a *Countywide Stormwater TMDL Implementation Plan* will be required and will be updated annually. The County will complete this plan in the new permit cycle as the next major update to the CIS.

There are currently 10 final approved TMDLs within Howard County with either an individual or aggregate SW-WLA, nine of which were addressed in the CIS. Since completion of the CIS, only one new local TMDL has been adopted, a PCB TMDL for the Patuxent approved by the EPA in September of 2017. Howard County submitted a draft PCB TMDL Restoration Plan for the Tidal Fresh portion of the Patuxent River (PAXTF) to MDE in September 2018. MDE approved the County's plan in a comment letter dated September 23, 2019. Howard County received comments from MDE, held two meetings with MDE to discuss the plan including the source tracking and monitoring elements, and collaborated with Anne Arundel County on a consistent monitoring approach. Howard County addressed the comments and submitted a revised version of the report in April of 2020. Howard County is continuing dialogue with MDE and Anne Arundel County before developing a Sampling and Analysis Plan and initiating field investigations. Because the focus for PCBs is currently on source tracking, MDE has recommended that modeling PCB loads and reductions is not helpful or necessary at this stage. Therefore, after confirming with MDE, the County has not re-modeled PCB loads for the FY20 progress and has included the FY19 modeling results and loads in the submitted geodatabase.

Table 11 indicates the local TMDLs that the County is currently addressing. Although there are sediment and phosphorus TMDLs established for Centennial Lake (approved April 2002) and a bacteria TMDL established for the lower segment of the Patuxent River Upper (approved August 2011), they do not have SW-WLAs assigned to the Howard County MS4 source sector and are therefore not included in the County's TMDL requirements. The Triadelphia Reservoir has a sediment TMDL; however, the County MS4 Phase I urban sector requires a 0% reduction in baseline sediment loads and will not be addressed further. South Branch Patapsco does not have a local TMDL, but it is included in the analysis since it, with the Patapsco River Lower North Branch, makes up the Baltimore Harbor watershed. The Middle Patuxent watershed does not have a local TMDL. Attachment B of the County's current permit also lists a mercury impairment in Cash Lake in the Patuxent River Upper Watershed on the list of Howard County TMDLs with applicable SW-WLAs. Cash Lake and its drainage area are located wholly within Prince George's County, therefore Howard County is not responsible for this TMDL and it is not included.

Based on MDE guidance, growth in the stormwater load since the TMDL baseline year is not accounted for in the analysis. Local TMDLs are considered met, from a planning perspective, when the load reductions associated with restoration progress coupled with the planned restoration load reductions included in the County's database exceed the load reduction required. Some TMDLs are estimated to be exceeded by a wide margin because removals per pollutant type are not achieved at the same rate. TN removal rates are relatively

low compared to TP and TSS on a per project basis. This impacts watersheds with multiple TMDLs and also nested watersheds as in Baltimore Harbor.

The Chesapeake Assessment Scenario Tool (CAST) Chesapeake Bay Program Watershed Model Phase 6 (CBP WM P6) model was used to model baseline, progress, and planned loads for local TMDLs in FY2020. Previous modeling up through reporting the FY19 progress had used Phase 5.3.2 (MAST), however MAST is no longer available to report progress towards local TMDLs. Using CAST, the loads are translated from the values derived by the Bay model version 5.3.2 that was used in the development of the TMDLs and calibrated to the Phase 6 model, making them compatible with current methods following MDE recommendations. All County completed structural and nonstructural water quality improvement projects, enhanced stormwater management programs, and alternative stormwater control initiatives through 7/18/2014 were modeled in CAST to calculate 2014 permit loads. Progress through the end of FY20 was modeled in CAST to calculate current progress loads. MDE is currently working on a new local TMDL modeling system that will be available in the future to report progress toward load reductions. It is anticipated that this new spreadsheet model will be used for FY21 modeling, so we anticipate additional changes to the baseline, permit, and progress loads and load reductions with the FY21 reporting.

Table 11 presents disaggregated and calibrated baseline loads for each SW-WLA to calculate the load reduction required from the baseline value. Baseline loads calculated in MAST (Phase 5.3.2) and in CAST (Phase 6) are presented. In addition to the change from MAST to CAST, several watersheds were modeled at the edge of river (EOR) scale in FY20, while they had been modeled at the edge of stream (EOS) scale for FY19. This aligns better with how these TMDL were written, which was to address the water quality of the receiving water body rather than the smaller tributary streams of the watersheds. Watersheds modeled at the EOR scale include Baltimore Harbor, Rocky Gorge Dam, and Triadelphia Reservoir.

The Patapsco River LNB bacteria TMDL is a 75% reduction in a smaller subwatershed (PAT0148). Loads and load reductions were calculated using data and assumptions from the Watershed Treatment Model (WTM) developed by the Center for Watershed Protection. The calculations integrate bacteria colonies per lb of dog waste (10 bn MPN/lb), a 65% die-off factor between source and receiving streams, and estimates of the program's effectiveness in motivating owners to pick up waste. Of the 3,882.6 lbs of waste collected, it was assumed that 60% of that waste would have been picked up anyway even without the pet waste stations (WTM documentation, 2001), and that 40% or 1,553.0 lbs would be considered "new" pick up.

Table 11: Howard County Local TMDL Summary (FY19 values presented in gray below FY20 values)

Watershed Name	Watershed Number	WLA Type	Pollutant and Units	Baseline Year	Baseline Load	MDE Published Reduction
Patapsco River Lower North Branch	02130906	Individual	Sediment EOS lbs/yr	2005	24,009,604 (6,123,442)	10.0%
		Aggregate	Bacteria MPN/100m L/yr	2005	21,826	75%
Baltimore Harbor (Patapsco R LN Br + S Br Patapsco)	02130906	Aggregate	Nitrogen EOR lbs/yr	1995	80,817 (107,059)	15.0%
	02130908					
	02130906	Aggregate	Phosphorus EOR lbs/yr	1995	5,743 (6,546)	15.0%
	02130908					

Patuxent River Tidal Fresh	Subshed PAXTF	Aggregate	PCB g/yr	2014	208	99.9%
Patuxent River Upper	02131104	Individual	Sediment EOS lbs/yr	2005	2,503,191 (145,902)	11.40%
Little Patuxent River	02131105	Individual	Sediment EOS lbs/yr	2005	42,481,555 (10,135,186)	48.10%
Rocky Gorge Reservoir	02131107	Aggregate	Phosphorus EOR lbs/yr	2000	1,532 (861)	15%
Triadelphia Reservoir (Brighton Dam)	02131108	Aggregate	Phosphorus EOR lbs/yr	2000	5,832 (2,657)	15%
		Aggregate	Sediment EOR lbs/yr	2000	NA	0%

Chesapeake Bay TMDL

The Chesapeake Bay TMDL, established by the EPA (EPA, 2010), sets pollution limits for nitrogen, phosphorus, and sediment in the Chesapeake Bay Watershed. While not a requirement in the County's NPDES MS4 permit, strategies provided in County plans to meet local TMDL reduction targets and impervious restoration treatment are also modeled against the Bay TMDL goals in order to calculate progress. The County's MS4 permit is requiring compliance with the Chesapeake Bay TMDL for the stormwater sector through the use of the 20% impervious surface restoration strategy.

Management Measures

Management measures to reduce pollutant loads and restore impervious surfaces include structural stormwater BMPs, alternative practices, and also non-structural County based and homeowner-implemented programs. These include projects currently identified in the County's Capital Improvement Plan (CIP) list. Details of the specific planned projects and their associated pollutant reductions can be found in the County's NPDES geodatabase.

Howard County has partnered with the Patapsco Heritage Greenway to implement a pet waste program in the Patapsco LNB in the TMDL subwatershed (PAT0148) near Elkridge. Nine total pet waste stations were installed in 2019, eight of them within the TMDL subwatershed. The stations are emptied weekly and weight of material was measured and tallied. Data was recorded starting in July of 2019. A total of 3,883 pounds of pet waste was collected in a one year period from July 2019 through July 2020 at the eight stations within the TMDL watershed. These stations proved to be a successful way to encourage more people to pick up after their pets and reduce bacteria inputs to the watershed. However, due to funding constraints, this program has been temporarily put on hold.

Load Reductions

Load reductions achieved from restoration projects implemented from each individual TMDL baseline year through FY20 and load reductions to be achieved with planned implementation of the projects and programs detailed in the County's NPDES geodatabase and FAP are presented in Table 12. Load and load reduction values from FY20 modeling using CAST (Phase 6) and FY19 modeling using MAST (Phase 5.3.2) are both included for comparison purposes. Bacteria load reductions using the WTM methods are also included.

Table 12: SW-WLA FY20 Progress and Planned Reductions Summary (2019 values presented in gray below 2020 values)

	Baltimore Harbor		Little Patuxent	Patapsco R LN Branch		Patuxent River	Patuxent R Upper	Rocky Gorge Reservoir	Brighton Dam
	TN-EOR lbs/yr	TP-EOR lbs/yr	TSS-EOS lbs/yr	TSS-EOS lbs/yr	Bacteria MPN/100mL/yr	PCB g/yr	TSS-EOS lbs/yr	TP-EOR lbs/yr	TP-EOR lbs/yr
Reduction Targets									
TMDL Baseline Year	1995	1995	2005	2005	2003	2014	2005	2000	2000
Baseline Load	80,817 (107,059)	5,743 (6,546)	42,481,555 (10,135,186)	24,009,604 (6,123,442)	21,826	208	2,503,191 (145,902)	1,532 (861)	5,832 (2,657)
Target % Reduction	15.0%	15.0%	48.1%	10.0%	75.0%	99.9%	11.4%	15.0%	15.0%
Calibrated Target Reduction	12,123 (16,059)	861 (982)	20,433,628 (4,875,025)	2,400,960 (612,344)	16,370	208	285,364 (16,633)	230 (129)	875 (399)
Calibrated TMDL WLA	68,694 (91,000)	4,882 (5,564)	22,047,927 (5,260,162)	21,608,643 (5,511,098)	5,457	0.1	2,217,827 (129,269)	1,303 (732)	4,957 (2,259)
Current Reductions – 2020 Progress									
Restoration Reductions (from baseline to present)	8,994 (7,846)	2,107 (1,851)	14,059,657 (5,174,394)	8,700,088 (4,172,436)	5,681 (159)	11	118,389 (45,380)	637 (394)	563 (925)
Restoration Reduction %	11.1% (7.3%)	36.7% (28.3%)	33.1% (51.1%)	36.2% (68.1%)	26.0% (0.7%)	5.4%	4.7% (31.1%)	41.5% (45.8%)	9.7% (34.8%)
Reduction Remaining	3,129 (8,213)	-1,245 (-869)	6,373,970 (-299,369)	-6,299,128 (-3,560,092)	10,689 (16,210)	197	166,975 (-28,748)	-407 (-265)	312 (-527)
Reduction Percent Remaining	3.9% (7.7%)	-21.7% (-13.3%)	15.0% (-3.0%)	-26.2% (-58.1%)	49.0% (74.3%)	94.5%	6.7% (-19.7%)	-26.5% (-30.8%)	5.3% (19.8%)
Planned Reductions									
Planned Reductions	3,164 (8,374)	939 (1,558)	6,401,518 (5,067,411)	4,558,408 (5,014,482)	11,143 (16,871)	16	468,123 (378,510)	105 (127)	0 (0.2)
FY20 – FY23 Credit Year	2,064 (2,874)	939 (1,558)	1,401,518 (5,067,411)	4,558,408 (5,014,482)	643 (501)	16	468,123 (378,510)	105 (127)	315 (0.2)
Additional Projects	5,500		5,000,000		-				315

	Baltimore Harbor		Little Patuxent	Patapsco R LN Branch		Patuxent River	Patuxent R Upper	Rocky Gorge Reservoir	Brighton Dam
	TN-EOR lbs/yr	TP-EOR lbs/yr	TSS-EOS lbs/yr	TSS-EOS lbs/yr	Bacteria MPN/100mL/yr	PCB g/yr	TSS-EOS lbs/yr	TP-EOR lbs/yr	TP-EOR lbs/yr
	(1,100)		(-)						(-)
<i>Pet Waste</i>	-		-		10,500 (16,370)				
Restoration Reduction %	3.9% (7.8%)	16.4% (23.8%)	15.1% (50.0%)	19.0% (81.9%)	51.1% (77.3%)	7.5%	18.7% (259.4%)	6.8% (14.7%)	5.4% (0.01%)
Totals (Current + Planned)									
Reduction (current + planned)	12,158 (16,220)	3,046 (3,409)	20,461,176 (10,241,805)	13,258,496 (9,186,917)	16,824 (17,031)	27	586,512 (423,890)	741 (521)	878 (925)
Reduction % (current + planned)	15.0% (15.2%)	53.0% (52.1%)	48.2% (101.1%)	55.2% (150.0%)	77.1% (78.0%)	12.8%	23.4% (290.5%)	48.4% (60.5%)	15.1% (34.8%)
Reduction Remaining for Treatment	-35 (-162)	-2,185 (-2,427)	-27,548 (-5,366,781)	-10,857,535 (-8,574,573)	-454 (-661)	181	-301,148 (-407,258)	-511 (-392)	-3 (-527)

Cost and Schedule

Details of the specific planned projects and their associated load reductions and cost can be found in the County's NPDES geodatabase submitted with this annual report. The County's local TMDL implementation schedule with end dates is included in Table 13. These are the timelines that were established in the 2015 and 2017 versions of the CIS, which will be reevaluated as modeling tools are updated and with the County's new permit. As stated in Howard County's PCB TMDL restoration plan for the Patuxent River Tidal Fresh, the final date for meeting the required load reductions will be determined based on the results of the first part of implementation and the Targeted Reduction Strategy.

Table 13: Implementation Schedule with End Dates Indicated

Watershed	Fiscal Year												
	18	19	20	21	22	23	24	25	26	27	28	29	30
Little Patuxent													2025
Middle Patuxent													No local TMDL
Patuxent River TF													To be determined after Part I implementation
Patuxent River Upper													2019
Rocky Gorge Reservoir													2019
Triadelphia Reservoir													2020
Baltimore Harbor													2029
South Branch Patapsco													
Patapsco LNB													2029

¹ Primary project completion period is shown in green, additional implementation contingent period for each TMDL are in blue.

² Baltimore Harbor TMDL includes the South Branch Patapsco and Patapsco Lower North Branch watersheds. There is no local TMDL specifically for the South Branch Patapsco.

Adaptive Management

The MS4 permit calls for an iterative and adaptive plan for implementation. The County will continue to monitor implementation progress on a regular basis and will report progress, load reductions achieved, and impervious surface reductions to MDE with the NPDES Annual Update and at required milestone intervals. If new methods of stormwater treatment are identified, or better approaches to source control are found, the plans can be extended and updated to take these changes into account. Similarly, if some elements of the plans are not as successful as expected, adaptations and improvements will be incorporated in future updates. Plans may also change if pollutant removal crediting methods are modified in the future.

In 2020, the baseline, permit, and progress loads were calculated using the Phase 6 version of the Chesapeake Bay Watershed Model (P6 Model; CAST). All previous modeling was based on Phase 5.3.2 of the Chesapeake Bay Watershed Model (BayFAST, MAST). The changes in P6 loading and reduction rates changed current local TMDL progress and anticipated load reductions from planned BMPs when compared to previous modeling. MDE is

currently working on a new system based on a combination of Phase 5 and Phase 6 that will be available in the future to report progress toward load reductions.

Additionally, it is the County's understanding that once the County is under its next generation permit, that in addition to the MDE spreadsheet model for local TMDLs, that pollutant load reductions and impervious acre equivalencies will be calculated based on MDE's updated *Accounting for Stormwater Wasteload Allocations and Impervious Acres Treated* guidance (MDE, 2020) and associated Bay Program expert panel reports.

3. Public Participation

Howard County shall provide continual outreach to the public regarding the development of its watershed assessments and restoration plans. Additionally, the County shall allow for public participation in the TMDL process, solicit input, and incorporate any relevant ideas and program improvements that can aid in achieving TMDLs and water quality standards. Howard County shall provide:

- a. Notice in a local newspaper and the County's website outlining how the public may obtain information on the development of watershed assessments and stormwater watershed restoration plans and opportunities for comment;**
- b. Procedures for providing copies of watershed assessments and stormwater watershed restoration plans to interested parties upon request;**
- c. A minimum 30 day comment period before finalizing watershed assessments and stormwater watershed restoration plans; and**
- d. A summary in each annual report of how the County addressed or will address any material comment received from the public.**

Annual Update Number 25 Status

Little Patuxent and Middle Patuxent Watershed Assessments

For the Little Patuxent and Middle Patuxent Watershed Assessments the County provided public notice in the Howard County Times legal section on June 4, 2015 and November 19, 2015 as well as on the County public meeting webpage and the SWMD webpage. A general press release noting the meetings was also available to local media outlets. The press release and legal ad noted when the watershed assessment and restoration plans would be available to begin the 30-day review period. Public meetings were held on the following:

Table 14: Little Patuxent River and Middle Patuxent River Watershed Assessment Public Meeting Schedule

<i>Date</i>	<i>Watershed</i>	<i>Time</i>	<i>Location</i>
6/17/2015	Southern Middle Patuxent	7:00 pm – 8:30 pm	Robinson Nature Center
6/22/2015	Northern Little Patuxent	7:00 pm – 8:30 pm	Dunloggin Middle School
6/24/2015	Southern Little Patuxent	7:00 pm – 8:30 pm	Hammond High School
6/30/2015	Northern Middle Patuxent	7:30 pm – 9:00 pm	Folly Quarter Middle School

Date	Watershed	Time	Location
12/2/2015	Northern Middle Patuxent	6:30 pm – 8:00 pm	Gary J. Arthur Community Center
12/3/2015	Southern Little Patuxent	6:30 pm – 8:00 pm	North Laurel Community Center
12/9/2015	Southern Middle Patuxent	6:30 pm – 8:00 pm	Robinson Nature Center
12/10/2015	Northern Little Patuxent	6:30 pm – 8:00 pm	Howard Community College

In addition to the public notice provided in the Howard County Times, postcards were mailed with meeting invitation encouraging the residents within the watershed(s) to attend the public meeting(s). All public meeting attendees were given the opportunity to comment on issues and goals of the watershed assessment.

The County investigated any issues raised and reviewed any comments received on the watershed assessments. During the public meetings only comments about specific problems on individual properties were received. All have been followed up on, either by meeting with the property owner and/or by adding the site to the watershed assessment.

After the public meetings, both the watershed assessments and the Countywide Implementation Strategy (CIS) reports were made available for public review and comment for a minimum 30 days. The County received comments on both documents from the Chesapeake Bay Foundation (CBF) and also received comments from a citizen regarding the CIS only. These were the only comments received. The MS4 Permit requires a summary of how the County addressed or will address material comments received from the public, provided as follows:

1. Commenters noted that the summary tables indicate that the nitrogen reductions required by the Bay TMDL will not be met.

Response: The computations and tables provided in these documents are based on a portion of the projects identified in the LP/MP Study and projecting a similar number of sites for the yet to be completed Patapsco and Main Patuxent watershed study (currently underway). While nearly 800 potential projects were identified in the LP/MP Study it was only practical to prepare concept plans for 148 of those sites. The loading computations in the reports are based on the 148 sites with concept plans but there are obviously well more sites available for future projects, which can supply added nutrient reductions. The CIS shows that the only local TMDL reduction target for nitrogen, which is in the South Branch Patapsco Watershed, will be exceeded. Also, MDE's Basis for Final Determination to Issue Howard County's NPDES MS4 Permit notes that the 20% restoration strategy will meet the necessary reductions for interim and long term Bay restoration milestones. The Permit itself states in Part VI Section A (Special Programmatic Conditions, Chesapeake Bay Restoration by 2025) that compliance with the Chesapeake Bay TMDL is required using the 20% restoration strategy within the five year permit term. No changes to either study have been made based on this comment.

2. CBF is concerned that stream restoration is the predominant type of project identified in the LP/MP Study. They contend that without doing upland infiltration and flow reduction stream projects often fail and they further state that stream projects are not cost effective.

Response: The County has been doing stream restoration projects for more than 10 years and our first hand experience over that time shows stream projects to be very cost-effective. Except for one or two times where we've needed to do localized repairs, which were done by manual labor or with a small piece of equipment, the projects have been successful. The upland infiltration and flow reduction would most likely be spread out on multiple

private properties, which are typically more problematic and less cost-effective both short and long term. The County can only recommend that private property owners put in rain gardens, dry wells, rain barrels, or other techniques for upland controls, but we cannot mandate their installation and we have no long term control over these voluntary BMPs. Furthermore these facilities will require inspections and routine maintenance, which adds costs to the County and time/costs to the private property owners. Anecdotally we are finding that many property owners with these types of ESD devices that are required by development regulations are filling them in and/or requesting that they be removed from their property. The County certainly promotes the use of voluntary BMPs on private properties such as rain gardens, swales, dry wells, rain barrels, and tree planting, but it is not prudent nor within our control to use these BMPs as a predominant means for achieving our restoration and TMDL goals. For example, as shown in the CIS, 586 rain barrels were given away by the County in four years, and these rain barrels account for only 0.3 acres of impervious area treatment. While rain barrels are good educational tools for teaching residents about water quality, they are clearly not the most cost-effective or efficient solution to meeting the short-term goals and requirements of the MS4 Permit. No changes to either study have been made based on this comment.

3. CBF notes that the restoration projects considered and recommended are unduly limited to publicly owned land.

Response: This statement is incorrect as close to 75% of the projects identified by the LP/MP Study are on private property. No changes to either study have been made based on this comment.

4. CBF recommends considering additional prioritization or performance factors when selecting projects for recommendation, such as permanence and maintenance costs.

Response: The County's prioritization approach in the LP/MP Study has already considered many factors including permanence and maintenance. While there might not have been specific line items with these two titles they have certainly been considered. We will try to make this more apparent in the current Patapsco/Main Patuxent watershed study. No changes to either study have been made based on this comment.

5. CBF suggests that timeframes for permit compliance and final wasteload allocation (WLA) targets appear to be inconsistent with the deadlines under the permit and Bay TMDL.

Response: The County has specifically used the aggressive MS4 permit and the Bay TMDL deadlines for providing a plan to meet both dates. Local TMDLs do not have a deadline yet, but the County feels that we have suggested an equally aggressive schedule for meeting the local TMDLs, which are known at this time. No changes to either study have been made based on this comment.

6. CBF questions taking restoration and nutrient reduction credit for the stabilization of storm drain outfalls.

Response: The County intends on using restoration techniques in the MDE accounting documents to address the storm drain outfalls so taking restoration and nutrient reduction credit is proper. No changes to either study have been made based on this comment.

7. CBF states that citizen programs noted on pages 44-50 of the CIS are not accounted for in future load reduction projections.

Response: It is the County's intent to continue citizen programs that are found to be productive and help us to ultimately meet our goals and we will continue to look for new citizen programs. Examples of these programs include many current incentive programs to promote localized BMPs such as rain gardens, rain barrels, and tree planting. We are currently looking at a new incentive program relative to septic system maintenance. It should also be noted that the County performs many citizen related efforts, foremost of which is public education, which are not officially creditable through MDE's accounting documents; however we continue to pursue these efforts

that help improve the quality of the waterways in the County, which ultimately helps the Bay. No changes to either study have been made based on this comment.

Mainstem Patuxent and Patuxent River Watershed Assessments

Watershed assessments for the Mainstem Patuxent River and Patapsco River Watersheds were performed in 2016. The Mainstem Patuxent River is made up of the Brighton Dam/Triadelphia Reservoir Watershed, the Rocky Gorge Reservoir Watershed, and the Upper Patuxent River Watershed. The Mainstem Patapsco River Watershed is made up of the Lower North Branch and the South Branch Patapsco River Watersheds. For the Mainstem Patuxent River and Patapsco River Watershed Assessments the County provided public notice for round 1 of the public meetings in the Howard County Times legal section on June 9, 2016 and for round 2 on January 5, 2017 as well as on the County public meeting webpage and the SWMD webpage. A general press release noting the meetings was also available to local media outlets. The press release and legal ad noted when the watershed assessment and restoration plans would be available to begin the 30-day review period. Public meetings dates and times for the Mainstem Patuxent River and Patapsco River Watershed Assessments are following:

*Table 15: Mainstem Patuxent River and Patapsco River Watershed
Assessment Public Meeting Schedule*

Date	Watershed	Time	Location
6/21/2016	Rocky Gorge Reservoir and Upper Patuxent River	7:00 pm – 8:30 pm	North Laurel Community Center
6/23/2016	Lower North Branch Patapsco	7:30 pm – 9:00 pm	Roger Carter Community Center
6/28/2016	South Branch Patapsco and Brighton Dam/Triadelphia Reservoir	7:00 pm – 8:30 pm	Gary J. Arthur Community Center
Date	Watershed	Time	Location
1/23/2017	Mainstem Patuxent River	7:00 pm – 8:30 pm	Gary J. Arthur Community Center
1/26/2017	Mainstem Patapsco River	7:00 pm – 8:30 pm	Roger Carter Community Center

No public comments were received on the Mainstem Patuxent River and Patapsco River Watershed Assessments themselves. The County investigated any issues brought to our attention at the public meetings, which were limited to comments about specific problems on individual properties. All have been followed up on, either by meeting with the property owner or performing site reviews and relaying the issues to the proper County agencies.

4. TMDL Compliance

Howard County shall evaluate and document its progress toward meeting all applicable stormwater WLAs included in EPA approved TMDLs. An annual TMDL assessment report with tables shall be submitted to MDE. This assessment shall include complete descriptions of the analytical methodology used to evaluate the effectiveness of the County's restoration plans and how these plans are working toward achieving compliance with EPA approved TMDLs. Howard County shall further provide:

- a. Estimated net change in pollutant load reductions from all completed structural and nonstructural water quality improvement projects, enhanced stormwater management programs, and alternative stormwater control initiatives;*
- b. A comparison of the net change in pollutant load reductions detailed above with the established benchmarks, deadlines, and applicable stormwater WLAs;*
- c. Itemized costs for completed projects, programs, and initiatives to meet established pollutant reduction benchmarks and deadlines;*
- d. Cost estimates for completing all projects, programs, and alternatives necessary for meeting applicable stormwater WLAs; and*
- e. A description of a plan for implementing additional watershed restoration actions that can be enforced when benchmarks, deadlines, and applicable stormwater WLAs are not being met or when projected funding is inadequate.*

Annual Update Number 25 Status

The reporting items requested under permit condition E.4.a-e are based on the 2020 progress evaluation presented in the County's NPDES geodatabase through the end of fiscal year 2020 (June 30), and the planned management and restoration strategies. A detailed accounting of the stormwater BMPs, alternate practices, and programs implemented through 2020 is included in the County's NPDES geodatabase. Progress results are summarized here to address the permit condition.

Pollutant Load Reductions

Baseline, target, permit, and current loads for nutrient, sediment, and bacteria local TMDLs are presented in the MDE NPDES MS4 geodatabase table LocalStormwaterWatershedAssessment. Countywide baseline, target, permit, and current loads are presented in table CountywideStormwaterWatershedAssessment.

The Chesapeake Assessment Scenario Tool (CAST) Chesapeake Bay Program Watershed Model Phase 6 (CBP WM P6) model was used to model baseline, progress, and planned loads. Previous modeling had used Phase 5.3.2 (MAST), however MAST is no longer available to report progress towards local TMDLs. MDE is currently developing a spreadsheet based model for use with local TMDLs. It is anticipated that this new spreadsheet model will be used for FY21 modeling. Table 16 presents load and load reduction values from FY20 modeling using CAST (Phase 6) and FY19 modeling using MAST (Phase 5.3.2) for comparison purposes. Bacteria load reductions are calculated using data and assumptions from the Watershed Treatment Model (WTM).

Item E.4.a requests the net change in pollutant loads reductions from all completed structural and nonstructural water quality improvement projects, enhanced stormwater management programs, and alternative stormwater control initiatives. Additionally, item E.4.b requires a comparison to the County's SW-WLAs. Taken together these requests are focused on the progress made in addressing local TMDL SW-WLAs. Therefore the County considers this request to include restoration projects and programs completed from the baseline SW-WLA year (which differs between watersheds) to the current year.

Table 16: SW-WLA Progress Reductions as of 2020 (2019 values presented in gray below 2020 values)

Watershed Name	Watershed Number	Pollutant	Scale ¹	Calibrated Target Reduction ²	Reduction Percent Required	2020 Progress Load ²	2020 Progress Reduction Percent
Patapsco River Lower North Branch	02130906	Sediment	EOS	24,009,604 (612,344)	10.0%	15,309,516 (4,172,436)	36.2% (68.1%)
		Bacteria	EOS	21,826 (16,370)	75%	16,145 (159)	26.0% (0.7%)
Baltimore Harbor (Patapsco R LN Br + S Br Patapsco)	02130906	Nitrogen	EOR	80,817 (16,059)	15.0%	71,823 (7,846)	11.1% (7.3%)
	02130908						
	02130906	Phosphorus	EOR	5,743 (982)	15.0%	3,636 (1,851)	36.7% (28.3%)
	02130908						
Patuxent River ³	PAXTF	PCB	EOS	207.8	99.9%	11	5.4%
Patuxent River Upper	02131104	Sediment	EOS	2,503,191 (16,633)	11.40%	2,384,802 (45,380)	4.7% (31.1%)
Little Patuxent River	02131105	Sediment	EOS	42,481,555 (4,875,025)	48.10%	28,421,897 (5,174,394)	33.1% (51.1%)
Rocky Gorge Reservoir	02131107	Phosphorus	EOR	1,532 (129)	15%	896 (394)	41.5% (45.8%)
Triadelphia Reservoir (Brighton Dam)	02131108	Phosphorus	EOR	5,832 (399)	15%	5,268 (925)	9.7% (34.8%)
		Sediment	EOR	--	0%	--	--

¹ EOS is Edge of Stream, EOR is Edge of River

² All values in lbs/yr except for bacteria which is bn MPN/yr and PCB which is g/yr.

³ Based on MDE Guidance, PCB loads were not modeled in FY20. Values presented here represent FY19 modeling results.

See Table 16 above for detailed comparisons of WLAs, and comparisons between the progress loads and the required WLA and reduction. Some TMDLs are projected to be far exceeded because removals per pollutant type are not achieved at the same rate. This occurs in watersheds with more than one pollutant type with a SW-WLA, and in nested watersheds. TN removal rates are relatively low compared to TP and TSS on a per project basis. For example, the number of projects needed to meet the Baltimore Harbor TN reduction goal resulted in overachieving on the TP reduction and the TSS reduction in the Patapsco River LNB, which is nested in the Baltimore Harbor watershed.

According to the current CAST model results with BMP implementation through FY20, three local TMDLs have been met. They are listed here with the CIS planned target completion date:

- Baltimore Harbor – phosphorus – 2029
- Patapsco LNB – sediment – 2029
- Rocky Gorge Reservoir – phosphorus – 2019

Previous modeling, including FY19 progress modeling, was conducted using MAST P5.3.2. FY19 progress modeling resulted in three additional local TMDLs being met. Even with additional progress in these watershed during FY20, the new modeling results using CAST no longer indicate that these TMDLs are being met. These TMDLs include:

- Little Patuxent – sediment – 2025
- Patuxent River Upper – sediment - 2019
- Triadelphia Reservoir – phosphorus - 2020

Modeling in FY21 using MDE's spreadsheet model will be used as an additional line of evidence to determine if the SW-WLA's for these TMDLs haven been achieved.

Cost of Completed Projects

The County's FY20 capital budget for restoration projects (pond retrofits, stream restoration) including design and construction was \$42 million. Annual costs for street sweeping are \$400,000 and for inlet cleaning are \$100,000. To date the County has encumbered approximately \$133.5 million for projects completed through FY20. Cost of individual projects are detailed in the submittal NPDES geodatabase.

Cost of Planned Projects and Programs

The County has allocated \$27 million in capital budget for FY21. A portion of those dollars are marked for design and construction of restoration projects for TMDLs. In addition, the County has budgeted for \$6.7 million in operating budget to support general NPDES compliance.

At this point in time there are many unknown factors influencing budgetary decision making. The County anticipates receiving a new NPDES MS4 permit in the coming year which could place different or new requirements on the County with regard to the Bay TMDL, impervious restoration, and targeted reductions for TN and TSS. Additionally, modeling methods and impervious restoration calculation methods are changing with further development of MDE's modeling tools for local TMDLs based on a combination of Phase 5 and Phase 6 elements and MDE's *Accounting for Stormwater Wasteload Allocations and Impervious Acres Treated* guidance (MDE, 2020). Changes in loading and reduction rates may change current local TMDL progress and anticipated load reductions from planned BMPs.

Based on these factors, all local TMDLs will be re-evaluated to assess progress in 2021, and as a consequence detailed annual fiscal budgets for NPDES and TMDL compliance are not possible. The County will evaluate if a fully updated CIS is needed to plan for the next several years of progress towards TMDL goals.

F. Assessment of Controls

Howard County and ten other municipalities in Maryland have been conducting discharge characterization monitoring since the early 1990s. From this expansive monitoring, a statewide database has been developed that includes hundreds of storms across numerous land uses. Analyses of this dataset and other research performed nationally effectively characterize stormwater runoff in Maryland for NPDES municipal stormwater purposes. To build on the existing information and to better track progress toward meeting TMDLs, better data are needed on ESD performance and BMP efficiencies and effectiveness.

Assessment of controls is critical for determining the effectiveness of the NPDES stormwater management program and progress toward improving water quality. The County shall use chemical, biological, and physical monitoring to assess watershed restoration efforts, document BMP effectiveness, or calibrate

water quality models for showing progress toward meeting any applicable WLAs developed under EPA approved TMDLs identified above. Additionally, the County shall conduct physical stream monitoring to assess the implementation of the latest version of the 2000 Maryland Stormwater Design Manual. Specific monitoring requirements are described below.

1. Watershed Restoration Assessment

The County shall continue monitoring in the Wilde Lake and Red Hill Branch watersheds, or select and submit for MDE's approval a new watershed restoration project for monitoring. Monitoring activities shall occur where the cumulative effects of watershed restoration activities can be assessed. One outfall and an associated in-stream station, or other locations based on a study design approved by MDE, shall be monitored. The minimum criteria for chemical, biological, and physical monitoring are as follows:

a. Chemical Monitoring

- i. Eight (8) storm events shall be monitored per year at each monitoring location with at least two occurring per quarter. Quarters shall be based on the calendar year. If extended dry weather periods occur, baseflow samples shall be taken at least once per month at the monitoring stations if flow is observed;*
- ii. Discrete samples of stormwater flow shall be collected at the monitoring stations using automated or manual sampling methods. Measurements of pH and water temperature shall be taken;*
- iii. At least three (3) samples determined to be representative of each storm event shall be submitted to a laboratory for analysis according to methods listed under 40 CFR Part 136 and event mean concentrations (EMC) shall be calculated for:*

<i>Biochemical Oxygen Demand (BOD₅)</i>	<i>Total Lead</i>
<i>Total Kjeldahl Nitrogen (TKN)</i>	<i>Total Copper</i>
<i>Nitrate plus Nitrite</i>	<i>Total Zinc</i>
<i>Total Suspended Solids</i>	<i>Total Phosphorus</i>
<i>Total Petroleum Hydrocarbons (TPH)</i>	<i>Hardness</i>
<i>E. coli or enterococcus</i>	

- iv. Continuous flow measurements shall be recorded at both in-stream monitoring stations or other practical locations based on an approved study design. Data collected shall be used to estimate annual and seasonal pollutant loads and reductions, and for the calibration of watershed assessment models. Pollutant load estimates shall be reported according to any EPA approved TMDLs with a stormwater WLAs.*

b. Biological Monitoring

- i. Benthic macroinvertebrate samples shall be gathered each Spring between the outfall and instream monitoring locations or other practical locations based on an approved study design; and*
- ii. The County shall use the EPA Rapid Bioassessment Protocols (RBP), Maryland Biological Stream Survey (MBSS), or other similar method approved by MDE.*

c. Physical Monitoring

- i. A geomorphologic stream assessment shall be conducted in the Red Hill Branch watershed monitoring location or in a reasonable area based on an approved study design. This assessment shall include an annual comparison of permanently monumented stream channel cross-sections and the stream profile;*
- ii. A stream habitat assessment shall be conducted using techniques defined by the EPA's RBP, MBSS, or other similar method approved by MDE; and*
- iii. A hydrologic and/or hydraulic model shall be used (e.g., TR-20, HEC-2, HEC-RAS, HSPF, SWMM, etc.) in the fourth year of the permit to analyze the effects of rainfall; discharge rates; stage; and, if necessary, continuous flow on channel geometry.*

d. Annual Data Submittal

The County shall describe in detail its monitoring activities for the previous year and include the following:

- i. EMCs submitted on MDE's long-term monitoring database as specified in PART V below;*
- ii. Chemical, biological, and physical monitoring results and a combined analysis for approved monitoring locations; and*
- iii. Any requests and accompanying justifications for proposed modifications to the monitoring program.*

Annual Update Number 25 Status**Watershed Restoration Assessment****Wilde Lake Monitoring**

In 2006, the County began monitoring in the Wilde Lake watershed, and continued annually through the present reporting year. The Wilde Lake monitoring program includes geomorphic, chemical, physical habitat, and biological assessments conducted throughout the watershed to determine if the restoration efforts outlined in the *Centennial and Wilde Lake Watershed Restoration Plan* (CWP, 2005) are succeeding in reducing pollutant loading and increasing the health of the lakes and streams. The goal of the monitoring strategy is to assess the overall condition rather than focusing on specific sites. Additional detail on monitoring in Wilde Lake and results can be found in *Wilde Lake Watershed Discharge Characterization, Stream Monitoring and Watershed Assessment, Year Fifteen – 2020*.

Stormflow data were collected at Wilde Lake during this reporting period on October 16 and 27, November 24, and December 1, 2019, and February 7, March 19, and June 11 and 18, 2020. Baseflow data were collected on September 4, 2019. Median (2007-2020) concentrations of Cadmium, Copper, Lead, and Zinc in storm flows at the Wilde Lake sampling site have been and continue to be consistently below their associated water quality criteria set by MDE. Average concentrations of Cadmium and Copper continue to be below the acute and chronic criteria while average concentrations of Lead and Zinc exceed the chronic criteria for those pollutants, with four of eight storms having an EMC for Lead greater than the chronic criteria and no storms greater than the acute criteria. TSS levels in stormflow samples continue to be elevated, but not greater than the published chronic criteria, as would be expected during storm events in urban streams. E. coli counts from stormwater were well

above the published water quality criteria during 2015-2020, similar results to previously analyzed fecal coliform counts (2006-2015) which were also consistently high.

Biological monitoring was conducted in Spring 2020 at five sites in the Wilde Lake watershed. This was the 15th consecutive year of monitoring at Wilde Lake, which began in the spring of 2006. Sites sampled in 2020 were repeat visits of sites sampled in 2010 and again in 2015. Results of the Year 15 biological and physical habitat assessments in Wilde Lake indicated that the streams varied in habitat quality, but were only marginally capable of supporting aquatic life. Benthic macroinvertebrate sampling results from 2020 were similar to 2019, 2018 and 2017 with all sites showing a degraded urban stream condition with each of the five sites in the lowest possible 'Very Poor' range. Two of the five sampling sites had RBP habitat that rated 'Partially Supporting' and three rated 'Not Supporting'. MBSS's Physical Habitat Index (PHI) rated one site as 'Severely Degraded', one site as 'Degraded', and three sites 'Partially Degraded'. Overall, the stream system in the Wilde Lake watershed exhibits evidence of the urban stressors affecting it and has not demonstrated marked improvement over the fifteen years of monitoring.

Since 2006, a yearly geomorphic assessment has been conducted during the spring at sites throughout the Wilde Lake watershed. Assessment occurs at the same locations each year. The main goal of the monitoring is to assess the temporal variability of the geomorphic stability of the stream channels upstream of the lakes as they react to restoration activities. Overall, upstream improvements in the watershed do not appear to have significantly improved the habitat in the tributary streams. Based on 2006 – 2020 geomorphic assessments, the Wilde Lake mainstem continues to degrade with localized major changes in channel section and profile, especially in the downstream most reach. Changes in bed features include bank erosion, bar formation, and high sediment supply. Sediment deposition and transport are common with significant point bar and mid-channel accumulations in some areas, especially in the downstream reach. Bed and bank erosion is most evident along the downstream profile. Upstream reaches are not experiencing the same level of erosion as the downstream reach and have remained relatively stable over 2017-2020 period. A riparian buffer is lacking along most of the channel, likely contributing to bank erosion and instability.

Red Hill Branch Monitoring

In 2009, the County began monitoring in the Red Hill Branch watershed, which has continued annually through the present. The Red Hill Branch monitoring program includes geomorphic, chemical, physical habitat, and biological assessments conducted within and downstream of restoration projects to determine if the restoration are succeeding in reducing pollutant loading and increasing the health of the stream system. What follows is a brief summary of monitoring activities and results for 2020. More detail and results can be found in the annual report, Red Hill Branch Restoration Monitoring Year 11–2020.

Stormflow data were collected at the permanent water quality monitoring station at the Red Hill Branch site at Meadowbrook Park on October 16, October 27, November 24, and December 11, 2019, February 7, June 11, June 18, and September 29, 2020. Baseflow samples were also collected at these sites on September 4, 2019. Event mean concentrations of storm runoff ranged from 1.53 – 4.19 mg/mL for total nitrogen, 7 – 251 mg/mL for TSS, and 0.02 – 0.30 mg/mL for total phosphorus. Average metal concentrations at Meadowbrook Park were below their respective acute and chronic MDE criteria for Lead, Copper, and Zinc, whereas Lead results for 2019 were

above the chronic criteria. *E. coli* levels for all samples were well above the published water quality criteria, similar to results throughout the period of record.

A total of three storm events were sampled at the Red Hill Branch – Bramhope Lane stream restoration site during 2019-2020. Storms were sampled on February 11, March 18, and June 18, 2020. Baseflow samples were also collected at these sites on September 4, 2019. For the upstream site event mean concentrations ranged from 1.43 – 2.54 mg/mL for total nitrogen, 13 – 45 mg/mL for TSS, and 0.08 – 0.29 mg/mL for total phosphorus. At the downstream Bramhope site event mean concentrations ranged from 1.41 – 2.30 mg/mL for total nitrogen, 7 – 34 mg/mL for TSS, and 0.02 – 0.14 mg/mL for total phosphorus.

Three storm events were also sampled at the Salterforth pond retrofit site during 2019-2020. Storms were sampled on December 1, 2019, January 25, and June 11, 2020. No baseflow samples were collected as the pond is designed to be dry following rain events. For the inflow site event mean concentrations ranged from 1.01 – 2.68 mg/mL for total nitrogen, 13 – 24 mg/mL for TSS, and 0.10 – 0.68 mg/mL for total phosphorus. At the outfall site event mean concentrations ranged from 1.05 – 1.30 mg/mL for total nitrogen, 2 – 16 mg/mL for TSS, and 0.18 – 0.26 mg/mL for total phosphorus.

A biological monitoring program was initiated in Red Hill Branch during the spring of 2010 and has continued annually. The program includes the collection and analysis of the macroinvertebrate community, physical habitat assessments, and measurements of in situ water chemistry. Biological assessments involve macroinvertebrate sampling at three sites located at the downstream end of the major drainage areas within the Red Hill Branch subwatershed as well as a fourth control site located in an adjacent watershed. The monitoring stations are being used for the assessment of restoration activities in this watershed. In Red Hill Branch, post-restoration monitoring results indicate a subwatershed in an overall degraded ecological condition, with little change from the first two years of pre-restoration monitoring. During 2020, all four sites were classified as ‘Very Poor’ for biological condition, with BIBI scores of from 1.67 to 1.33; very similar results to 2019. Habitat assessments during 2020 again showed mixed results with all three Red Hill Branch sites and the control rated ‘Degraded’ for the Maryland PHI and classified as ‘Non Supporting’ for the control site and two Red Hill Branch sites, and ‘Partially Supporting’ for the other Red Hill Branch site for the RBP habitat assessment. The biological community and habitat fluctuate slightly from year-to-year, had results from 2020 that were very close to what was observed during 2019, but remain in a degraded condition and have not shown any significant improvement after restoration.

Geomorphic assessments in the Red Hill Branch subwatershed were conducted in May of 2019, eight years after the completion of the Bramhope Lane stream restoration project, to evaluate the effectiveness of this and other restoration projects undertaken in this subwatershed. Assessments were conducted at three sites, one within the lower portion of the restoration site, one downstream of the restoration site, and one on a similar channel in an adjacent watershed intended to serve as a control. Assessment included longitudinal profiles, permanently monumented cross-section surveys, pebble counts, substrate facies mapping, bulk-bar sample sieve analysis, and measurement of bed/bank pins and scour chains. In the years prior to restoration at all three reaches, bed features exhibited evidence of the continually shifting, dynamic nature of these urban systems, including deposition in some pools and bars, deepening of other pools, and shifting locations of riffle crests. At the two unrestored reaches, conditions have continued to be variable over the eight years of post-restoration monitoring with periods of erosion and deposition with the trend toward channel widening and deepening. After restoration, there has been far less change in channel dimensions and profile, and notably less erosion during post restoration monitoring at the restoration reach. The restored reach is relatively stable with only small areas of erosion and deposition.

Dorsey Hall Monitoring

The County began monitoring sites in Dorsey Hall project area in 2014 to assess new restoration activities in the Red Hill Branch watershed located downstream of the sites at Meadowbrook Park, Bramhope Lane stream restoration, and the Salterforth pond retrofit. Two sites were added, one on Red Hill Branch at Columbia Rd downstream of all restoration activities, and one site near the downstream end of Plumtree Branch upstream of its confluence with Red Hill Branch to measure effects of stormwater coming from the untreated Plumtree Branch. At each site chemical, biological, and physical habitat monitoring have been conducted annually. Full results of the monitoring are included in the report, *Dorsey Hall Restoration, Year 6, 2019-2020, Restoration Conditions Monitoring*.

Chemical monitoring consists of baseflow and stormflow chemical sampling for nitrogen, phosphorus, and sediment. Eight storm events were sampled at the Columbia Road and Plumtree Run sites during 2019-2020. Storms were sampled on January 25, February 11, and March 19, 2020. Baseflow samples were also collected at these sites on September 4, 2019. For the Columbia Rd site event mean concentrations ranged from 1.31 – 1.52 mg/mL for total nitrogen, 26 – 114 mg/mL for TSS, and 0.04 – 0.29 mg/mL for total phosphorus. At the Plumtree site event mean concentrations ranged from 1.11 – 1.44 mg/mL for total nitrogen, 15 – 95 mg/mL for TSS, and 0.01 – 0.21 mg/mL for total phosphorus.

Biological and physical habitat monitoring was conducted at these sites during spring of 2020 and narrative ratings for both sites were the same as those from 2019. Both sites rated 'Very Poor' for biological condition, with the Columbia Rd scoring a 1.33 and Plumtree also scoring 1.33. Maryland's PHI results for the Dorsey Hall sites show both sites falling into the lowest 'Severely Degraded' category with scores of 43.9 for Columbia Rd and 32.7 for Plumtree. The RBP habitat results were similar with both sites in the 'Not Supporting' category with scores of 48.5% and 51.5% of reference. The physical habitat results show that both sites are severely impacted, most likely from urban development with no evidence yet of ecological uplift after restoration.

Annual Data Submittal

Monitoring reports associated with Assessment of Controls monitoring including the programs summarized above, and the Rumsey Run Stormwater Management Assessment described below, can be found in the narrative files associated with the NPDES Geodatabase submittal. Also included are the monitoring site locations and drainage areas in the MonitoringSite and MonitoringDrainageArea feature classes.

The required chemical monitoring results and EMCs are found in the County's geodatabase submittal in the ChemicalMonitoring table for Wilde Lake and Meadowbrook (Red Hill). The County chose again this year, as it has the past four years, to also report on other monitoring that is being conducted above the NPDES requirements at several sites. These sites are partially funded by Chesapeake and Atlantic Coastal Bays funding and are focused on assessing watershed restoration, therefore the County chose to include them. Because they are not NPDES compliance specific sites, they do not have all data as required by the NPDES permit. These sites are associated with the Dorsey Hall project (Plumtree - PT and Columbia Road - CR) and the Red Hill monitoring at Brampton Hills (aka Bramhope Lane, Upstream - BH01, Downstream, BH02). For these sites data from FY2020 were added to previously submitted data from FY16, FY17, FY18, and FY19.

The required biological monitoring data are included in the BiologicalMonitoring table for the Wilde Lake and Red Hill monitoring projects. As with the chemical data, there are additional biological data submitted for the Dorsey Hall monitoring project. At this time, the County has no requests for modification to its monitoring program.

2. Stormwater Management Assessment

The County shall continue monitoring the Rumsey Run (tributary to Red Hill Branch) watershed, or select and submit for MDE's approval an alternative project for determining the effectiveness of stormwater management practices for stream channel protection. Physical stream monitoring protocols shall include:

- a. An annual stream profile and survey of permanently monumented cross-sections in Rumsey Run to evaluate channel stability in conjunction with surrounding and on-going commercial development;***
- b. A comparison of the annual stream profile and survey of the permanently monumented cross-sections with baseline conditions for assessing areas of aggradation and degradation; and***
- c. A hydrologic and/or hydraulic model shall be used (e.g., TR-20, HEC-2, HEC-RAS, HSPF, SWMM, etc.) in the fourth year of the permit to analyze the effects of rainfall; discharge rates; stage; and, if necessary, continuous flow on channel geometry.***

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In 2011, to evaluate the effectiveness of recent stormwater controls from developed sites for stream channel protection, Howard County and MDE chose an unnamed tributary to Red Hill Branch (hereafter called Rumsey Run) within the Red Hill Branch subwatershed for analysis. The County is monitoring the effectiveness of the 2000 Maryland Stormwater Design Manual and other innovative stormwater management technologies through geomorphic assessments, limited runoff investigations, and modeling in Rumsey Run. A full report of Rumsey Run monitoring methods, data analysis, and results are provided in the Evaluation of the Effectiveness of Maryland Stormwater Management Practices on Rumsey Run Channel Stability Year 9 – 2020 report, produced as a stand-alone document and submitted as part of the Annual Update.

Overall results suggest that the stormwater management practices in the drainage areas of the middle and lower reaches are having a positive effect on maintaining the stability of the stream. The middle reach receives drainage from the newest development which was constructed in 2006 with ESD to the MEP practices for stormwater management and with MDE 2000 channel protection criteria. This reach has remained stable and contains cross sections with the least amount of measured change in terms of cross-sectional area and downcutting observed across monitoring years. The upstream end of the middle reach also has 50+ feet of intact riparian buffer on the left bank, likely contributing to the overall stability of the reach. This reach has shown more complexity in pool generation during the 2020 survey, yet the overall stream morphology has remained consistent with previous years. Since the development in this middle reach is the most recent, the stream has had less time to reflect the potential effects of the development when compared to the other reaches, which have much older development within their drainage areas. Therefore, while it is possible that over time this area may show signs of degradation, channel instability has not yet been observed.

The lower reach receives drainage from an older development with pre-2000 stormwater management. While the longitudinal profile in this reach has remained relatively stable throughout the monitoring years, the banks indicated some widening over time with particle size varying the most within this reach. Finally, the upper reach receives drainage from a commercial/industrial park with little to no stormwater management and high levels of impervious surfaces. The reach is the least stable by far of all three reaches, including multiple migrating headcuts as well as significant bank widening and bed downcutting. Since the 2019 survey, a novel headcut has formed in

a portion that had been previously stabilized in 2018 by rip rap placement downstream. The slope of this reach has increased by 0.1% each monitoring year since 2018, to a slope of to 2.3% in 2020, compared to the relatively consistent slopes in the lower and middle reaches, at 1.5% and 1.3%, respectively. The lack of stormwater controls in the upper reach, coupled with higher valley and channel slopes in this section have likely resulted in the observed degradation. Higher slopes drive higher velocities and shear stress for the same level of discharge compared to lower slopes like those of the middle and lower reaches. The moderate slopes in those reaches are likely buffering their channels from bed and bank erosion.

Despite increasing degradation in the upper reach, the middle and lower reaches have remained relatively consistent throughout the monitoring years. In 2020, deeper and more frequent pools have formed within both the middle and lower reaches, providing opportunities for sediment deposition, fish habitat, and reduction of stream velocity. The overall results of the geomorphic assessment indicate that current stormwater management practices in the drainage areas of the middle and lower reaches, designed according to channel protection criteria requirements, are associated with reduced rates of stream degradation when compared with a reach that does not have stormwater management within its drainage area. This study suggests that even if the drainage area for the headwaters of a stream is highly impervious and leading to channel instability, it is still possible to improve the channel condition further downstream by incorporating stormwater management control in the downstream drainage areas.

Additional Assessment of Controls:

Countywide Biomonitoring Program

Howard County performs annual Countywide biological stream monitoring to characterize stream and watershed health. There is currently no specific NPDES MS4 requirement to complete this type of monitoring, however the County recognizes the importance in understanding the conditions of its stream systems. Data are used for general characterization, to support watershed assessment and management efforts, and to track conditions over time. Because there is no specific requirement, Howard County is presenting a summary of the program here and current reports are submitted for MDE's use; however specific site locations and site data are not included in the NPDES geodatabase. The included report is, *Howard County Biological Assessment, 2020, Patapsco River Lower North Branch B Watershed*.

Program Overview

The Howard County Department of Public Works Stormwater Management Division initiated the Howard County Biological Monitoring and Assessment Program in the spring of 2001. The County initiated the monitoring program to establish a baseline ecological stream condition for all of the County's watersheds. The program involves monitoring the biological health and physical condition of the County's water resources and is designed on a five year rotating basis such that each of the County's 15 watersheds, or primary sampling units (PSU) will be sampled once every five years.

Round 1 was completed from 2001 to 2003, Round 2 from 2005-2009, and Round 3 from 2012-2016, with 10 randomly selected sites sampled in each PSU. The current year of sampling (2020) is the fourth year of Round 4. To allow for paired site comparisons with previous Rounds, a total of four sites from Round One (2001), Round Two (2005), and Round Three (2012) were selected for resampling in each PSU. The remaining six sites in each PSU were randomly selected. Due to the COVID-19 pandemic, the sampling during 2020 scheduled for three PSUs was reduced to only one PSU.

The monitoring in each round involved sampling instream water quality, collection and analysis of the biological community (benthic macroinvertebrates) using Maryland Biological Stream Survey (MBSS) protocols, cross section analysis, particle size distribution, and assessment of the physical habitat using the United States Environmental Protection Agency's (EPA) Rapid Bioassessment Protocols (RBP). The sampling methods used are compatible with those used in the third round (2012-2016) with updates where applicable. All data collection occurred between March 1st and April 30th of 2020, as required by the MBSS protocols.

2020 Results

Biological and physical habitat assessment results for 2020 in Patapsco River Lower North Branch B indicate that watershed is impaired. Only two out of thirty benthic macroinvertebrate samples received a 'Fair' rating. The remaining sites (80%) were rated as either 'Poor' or 'Very Poor'.

Overall, the average watershed physical habitat conditions were 'Partially Supporting' for this subwatershed. The geomorphic assessment reveals a variable system. Using the Rosgen classification system for natural rivers (Rosgen, 1996), over half (60%) of the channels sampled throughout the subwatersheds were classified as incised F channels, 20% were classified as stable type B, or C channels, and 20% were categorized as non-determined due to recent restoration. Gravel and sand were the dominant substrate types in the majority of sampling reaches.

The average percentage of impervious area in the Patapsco River Lower Branch B subwatershed is 25.3%. Imperviousness for the areas draining to each sampling site range from 16.8% to 33.0% in the watershed.

Pearson correlations between the BIBI scores and physical habitat index scores (PHI and RBP) did not show significant relationships, suggesting that physical habitat index scores are not a reliable predictor of biological condition in this watershed. The relationship between specific conductivity and BIBI that was also not statistically significant. However, a significant correlation was observed between watershed impervious percent and specific conductivity, suggesting that increased conductivity is due in large part to urban runoff.

Results of the 2020 assessment indicate impaired biological conditions remain in the Patapsco River Lower Branch B watershed, and statistically significant changes in mean BIBI scores have been observed in this subwatershed over time. The 2020 BIBI results were significantly lower than Round 1 (2003), but not significantly different from Rounds 2 or 3. This suggests the PSU has become more impaired over time, but has not continued to become further impaired in recent years. Physical habitat scores also showed some statistically significant changes over time.

G. Program Funding

1. ***Annually, a fiscal analysis of the capital, operation, and maintenance expenditures necessary to comply with all conditions of this permit shall be submitted as required in PART V. below.***
2. ***Adequate program funding to comply with all conditions of this permit maintained. Lack of funding does not constitute a justification for noncompliance with the terms of this permit.***

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Howard County appropriated more than \$90 million to implement various aspects of NPDES activities and associated work during permit years FY06 through the first half of FY16 (the first half of FY16 is used since the County's new permit was issued halfway through FY16). The County continues to appropriate significant funding for its current permit, which was issued midway through FY16. Funding for the second half of FY16 through FY20 has exceeded the amount from FY06 through the first half of FY16. The Fiscal Analysis table in the geodatabase database has been completed to report on the funding for the current reporting period.

The database breaks out the funding into capital costs, operational costs, and information on the Watershed Protection and Restoration Fund (WPRF), as well as allowing the County to provide optional breakdowns for more specific task funding including maintenance. Capital costs include but are not limited to stream restoration and SWM construction projects, site-specific post-construction monitoring, and the purchase of monitoring equipment. Operational costs include but are not limited to County staff salaries, supplies, annually repeated expenses such as biological, physical, and chemical monitoring at NPDES program sites, illicit discharge inspections, SWM facility inspections, and public outreach efforts.

The County was selected in FY20 to receive a \$2.3 million grant from the Chesapeake and Atlantic Coastal Bays Trust Fund for constructing two water quality projects. These grant funds help the County leverage its available capital funds to be able to complete even more NPDES related water quality projects.

The County intends to maintain an adequate level of funding throughout the current permit term. As noted in previous Annual Updates, all funding shown herein and proposed is subject to yearly approval by the County Council and the County Executive.

Watershed Protection and Restoration Fund (WPRF)

In March of 2013, the County adopted legislation to enact the WPRF to be charged based on the number of 500 square-foot impervious units for all properties. In July of 2013 the legislation was amended to modify the manner in which residential properties were charged based on the size of the parcel. Three tiers were established, and the rates for townhomes, properties less than ¼ acre and properties greater than ¼ acre are charged \$15, \$45, and \$90 per year, respectively. In addition, programs were established to provide reduced fees for agriculturally assessed properties and non-profit properties if they met certain criteria identified that reduced the potential for impact. Further, residential and commercial project reimbursement and fee credit programs were established for property owners that choose to add additional stormwater BMPs to their parcel or update existing BMPs to provide water quality.

In 2016, Council Resolution CR 37-2016 amended the WPRF Assistance Program for nonresidential properties. The Fee is deemed a hardship for nonresidential properties that do not qualify as not for profits if the Fee exceeds a percentage of the total property tax bill. The property owner then pays a Fee equal to that percentage of the total property tax due for the property. In 2019 the percentage was 5%, which was a 15% decrease from the original hardship percentage cap and will remain the cap going forward. The WPRF funds are budgeted among various County agencies to fund programs such as:

- BMP controls to manage stormwater flow and reduce pollutants

- Storm drain infrastructure, operation, repairs and upgrades
- MS4 permit compliance including monitoring and enforcement
- Stormwater education, outreach, and incentive programs

Section III. Program Review and Annual Progress Reporting

A. Annual Reporting

As required by the NPDES permit, the County is submitting all Annual Update Databases electronically using a large file sharing system. In addition to the required databases, the SWPPP reports, monitoring reports, and the NPDES Contact List are included as narrative files, and additional Source Identification GIS files are included.

B. Reapplication for NPDES Stormwater Discharge Permit

This permit is effective for no more than five years, unless administratively continued by MDE. Continuation or reissuance of this permit beyond this permit term will require Howard County to reapply for NPDES stormwater discharge permit coverage in its fourth year annual report. Failure to reapply for coverage constitutes a violation of this permit.

As part of this application process, Howard County shall submit to MDE an executive summary of its NPDES stormwater management program that specifically describes how the County is meeting the overall goal to ensure that each County watershed has been thoroughly evaluated and its progress in implementing water quality improvements. This application shall be used to gauge the effectiveness of the County's NPDES stormwater program and will provide guidance for developing future permit conditions. At a minimum, the application summary shall include:

- 1. Howard County's NPDES stormwater program goals;*
- 2. Program summaries for the permit term regarding:*
 - a. Illicit discharge detection and elimination results;*
 - b. Restoration plan status including County totals for impervious acres, impervious acres controlled by stormwater management, the current status of water quality improvement projects and acres managed, and documentation of progress toward meeting stormwater WLAs developed under EPA approved TMDLs;*
 - c. Pollutant load reductions as a result of this permit and an evaluation of whether TMDLs are being achieved;*
 - d. Impervious acres compared to the baseline and twenty percent restoration requirement in PART IV.E.2.a.; and*
 - e. Other relevant data and information for describing County programs;*
- 3. Program operation and capital improvement costs for the permit term; and*
- 4. Descriptions of any proposed permit condition changes based on analyses of the successes and failures of the County's efforts to comply with the conditions of this permit.*

With Annual Report 23, Howard County formally reapplied for NPDES stormwater discharge permit coverage. Attachment 1 of MDE's August 2, 2019 comment letter acknowledges that the FY2018 Annual Report 23 serves as the County's reapplication for the NPDES stormwater discharge permit. Howard County's next permit will be the County's fifth-generation NPDES stormwater discharge permit.

In August 2018, MDE shared with the County draft language of the Assessment of Controls section of the next generation permit. The County met with MDE on September 21, 2018 to discuss the draft permit conditions

associated with this section. In August 2019, MDE shared draft language for all sections of the permit except Part IV. Section E. Restoration for Total Maximum Daily Loads and Chesapeake Bay, which was still under development. The County appreciates the opportunity to review and discuss the draft permit language and would be interested in reviewing future iterations of the next generation permit, as they become available. At this time, the County is not requesting any specific changes to permit conditions, but may request changes and provide comments on future drafts and tentative determinations of its fifth-generation NPDES stormwater discharge permit.

Section IV. Special Programmatic Conditions

A. Chesapeake Bay Restoration by 2025

A Chesapeake Bay TMDL has been developed by the EPA for the six Bay States (Delaware, Maryland, New York, Pennsylvania, Virginia, and West Virginia) and the District of Columbia.

The TMDL describes the level of effort that will be necessary for meeting water quality criteria and restoring Chesapeake Bay. This permit is requiring compliance with the Chesapeake Bay TMDL through the use of a strategy that calls for the restoration of twenty percent of previously developed impervious land with little or no controls within this five year permit term as described in Maryland's Watershed Implementation Plan. The TMDL is an aggregate of nonpoint sources or the load allocation (LA), and point sources or WLA, and a margin of safety. The State is required to issue NPDES permits to point source discharges that are consistent with the assumptions of any applicable TMDL, including those approved subsequent to permit issuance.

Urban stormwater is defined in the CWA as a point source discharge and will subsequently be a part of Maryland's WLA. The NPDES stormwater permits can play a significant role in regulating pollutants from Maryland's urban sector and in the development of Chesapeake Bay Watershed Implementation Plans. Therefore, Maryland's NPDES stormwater permits issued to Howard County and other municipalities will require coordination with MDE's Watershed Implementation Plan and be used as the regulatory backbone for controlling urban pollutants toward meeting the Chesapeake Bay TMDL by 2025.

B. Comprehensive Planning

Howard County shall cooperate with other agencies during the completion of the Water Resources Element (WRE) as required by the Maryland Economic Growth, Resources Protection and Planning Act of 1992 (Article 66B, Annotated Code of Maryland). Such cooperation shall entail all reasonable actions authorized by law and shall not be restricted by the responsibilities attributed to other entities by separate State statute, including but not limited to reviewing and approving plans and appropriating funds.

Annual Update Number 25 Status

The County recognizes the importance of the Chesapeake Bay restoration effort and has been working with MDE and other municipalities to help achieve the goals of the new 2014 Bay Agreement. The following paragraphs describe Howard County's recent and ongoing participation in programs that address the Chesapeake Bay water quality goals.

Patuxent Reservoirs Technical Advisory Committee

In 1996, Howard County joined Montgomery County, Prince George's County, WSSC, Maryland National Capital Park and Planning Commission (MNCPPC), HSCD, and Montgomery Soil Conservation District (MSCD) in signing the Patuxent Reservoirs Watershed Protection Agreement. The Agreement recognized the importance of

protecting the long-term biological, physical and chemical integrity of the watershed. The Agreement established a Policy Board and a Technical Advisory Committee (TAC) to oversee implementation of a protection strategy for the watershed.

The TAC has developed a list of priority resources in the watershed: the reservoirs and drinking water supply; terrestrial habitat; stream systems; aquatic biota; rural character and landscape; and public awareness and stewardship. Each priority resource has designated goals and implementation items for the TAC to restore and maintain the resource. TAC member implementation activities have included water quality monitoring and modeling, implementing agricultural best management practices, stormwater retrofits and stream channel restoration, and public outreach and education.

TAC member agencies continued work in the following areas: TMDL implementation for the Patuxent Reservoirs, agricultural BMP implementation, reservoir monitoring, and public outreach.

- In 2014, the TAC revised the Patuxent Reservoirs Protection Strategy Memorandum of Understanding, which established an Agricultural BMP Cost Share Program, to make more properties eligible for the program and increase the types of BMPs the program would fund. WSSC and Howard County renewed program funding for HSCD; MSCD still has funds remaining.
- In 2016 the TAC conducted research related to road salt impacts in the watershed and recommended the Policy Board form an interjurisdictional workgroup to develop a comprehensive salt reduction plan for the watershed. In 2018 the WSSC convened its first Salt Summit to bring together State and local agencies to discuss road salt management efforts. A second summit was held in October 2019, where attendees agreed to form workgroups to investigate management/policy, monitoring and public outreach, prior to the next summit.
- In 2018, the TAC completed its assessment of progress toward TMDL implementation and began assessing opportunities to increase implementation efforts. In 2019 the TAC determined that planting riparian buffers was the most cost-effective BMP to help achieve the TMDL.
- In 2019 the TAC continued efforts to establish a central location to gather GIS data layers from each County to create watershed-scale maps. These efforts were given a significant boost at the annual Policy Board meeting, when Prince George's County offered assistance from their GIS staff. The first project for the mapping effort in 2020 is to determine areas in need of riparian buffer planting.

The TAC produces an Annual Report that documents the TAC's accomplishments for the past year and priorities for the upcoming year.

Howard County's major initiatives in the Patuxent Reservoirs watershed include several capital projects as well as ongoing biomonitoring and public outreach activities. One stream restoration known as the Cherry Creek project is complete, and one pond repair/retrofit and a stream restoration project are currently under design in the Cherrytree Farm neighborhood in the Rocky Gorge reservoir watershed. The first round of biomonitoring was conducted in the reservoirs watershed in 2001 and 2003, and a second round of monitoring was done in the Cattail Creek and Brighton Dam watersheds in 2005 and in the Rocky Gorge watershed in 2009. The third and fourth rounds of biomonitoring were conducted in 2012 and 2017 in the Upper and Lower Brighton Dam and Cattail Creek watersheds.

Patuxent River Commission

Howard County is a member of the Patuxent River Commission, which provides oversight for implementation of the Patuxent River Policy Plan and development of the Chesapeake Bay Watershed Implementation Plan (WIP).

The Policy Plan is a land management strategy to reduce nonpoint source pollution, and protect and restore habitat in the Patuxent River watershed. The WIP specifies actions to achieve pollutant load reductions from wastewater treatment plants, septic systems, agriculture and urban stormwater, to meet the Chesapeake Bay Total Maximum Daily Loads for nitrogen, phosphorus and sediment. In 2014, the Commission adopted an update to the Policy Plan to reflect the new Bay TMDLs. This update was subsequently adopted by the local member jurisdictions, including Howard County, and approved by the Maryland General Assembly in 2016.

Water Resources Element

The Howard County Water Resources Element (WRE), adopted in April 2010, is an amendment to PlanHoward 2030 that adds Policies and Actions intended to ensure that the County has adequate water resource capacities to meet future growth needs through 2030. In particular, the WRE seeks to ensure a safe and adequate supply of drinking water, and adequate land and water capacity for the treatment of wastewater and stormwater. The WRE reflects the opportunities and limitations presented by local and regional water resources. It is intended to improve protection of land and water resources and to address water resource goals within the context of local and State smart growth policies. For more information on the WRE, please see the County web page at:

<https://www.howardcountymd.gov/Departments/Public-Works/Bureau-Of-Utilities/Tech-Support-Division/Bureau-of-Utilities-Water-Resources-Element>.

Cooperative Project with the U.S. Geological Survey

Howard County continues cost-sharing for the cost to operate a U.S. Geological Survey (USGS) flow gauging station on the Little Patuxent River near Savage, MD.

Maryland Water Monitoring Council

The County continues to participate in the MWMC's annual conferences, which are held at the Maritime Institute in Linthicum, MD. The FY2020 conference was held on December 6, 2019.

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